Case 5:07-cv-05910-JW Filed 11/21/2007 Page 1 of 210 Document 1 1 LAURENCE F. PULGRAM (CSB NO. 115163) lpulgram@fenwick.com BRIAN W. CARVER (CSB NO. 244878) 2 bcarver@fenwick.com 3 FENWICK & WEST LLP NOW LEUW NO LEUN NO CONTROLL OF CONTROL OF CON 555 California Street, 12th floor 4 San Francisco, CA 94104 Telephone: (415) 875-2300 5 Facsimile: (415) 281-1350 Attorneys for Plaintiff 6 CORBIS CORPORATION 7 8 UNITED STATES DISTRICT COURT 9 NORTHERN DISTRICT OF CALIFORNIA 10 SAN FRANCISCO DIVISION 11 CORBIS CORPORATION, a Nevada corporation, 12 COMPLAINT FOR COPYRIGHT FENWICK & WEST LLP ATTORNEYS AT LAW MOUNTAIN VIEW INFRINGEMENT AND VIOLATION OF Plaintiff. 13 THE DIGITAL MILLENNIUM COPYRIGHT ACT ٧. 14 MOBILETOYS, INC., a Delaware 15 DEMAND FOR JURY TRIAL corporation, 16 Defendant. 17 18 Plaintiff Corbis Corporation ("Corbis"), through its attorneys, alleges as its complaint 19 against Defendant MobileToys, Inc. ("MobileToys") as follows: 20 INTRODUCTION 21 1. Corbis is a leading visual-solutions provider, licensing images that enable 22 publishers, advertising and design agencies, filmmakers, and other creative professionals to tell 23 their stories with impact extending beyond words. Recently, at least sixteen images from the 24 Corbis collections were misappropriated, and used in at least two hundred instances, without 25 license or permission, or exceeding any license or permission—contrary to the rights of Corbis 26 and of the photographers that Corbis represents. Such images were reproduced, displayed, 27 distributed, and otherwise misused—in pursuit of profit—on Defendant's website without 28 PLAINTIFF CORBIS' COMPLAINT FOR COPYRIGHT INFRINGEMENT AND

VIOLATION OF THE DMCA

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adequate payment of compensation to Corbis for their use. Because Defendant MobileToys has failed to satisfactorily respond to Corbis' good-faith demand, attempts to informally resolve this dispute have proven futile, and Corbis files this action for copyright infringement under 17 U.S.C. § 501, et seq.

JURISDICTION AND VENUE

- 2. The Court has subject matter jurisdiction over this action pursuant to 28 U.S.C. §§ 1331 (federal question) and 1338 (copyright), as this action involves claims brought under federal law and the United States Copyright Act, 17 U.S.C. §§ 101, et seq.
- 3. This Court has personal jurisdiction over Defendant as it does business in the State of California and in this District. Defendant sells its products and services, such as its InstallCard, at both national retailers with locations in this District and at independent retailers located in this District. Among other things, Defendant displays its interactive webpage throughout this district through the web addresses www.mobiletoys.net and www.soundsolutionscorp.com. Defendant also does business with and through the following authorized dealers in this district, among others:

Motor Music	Daly City, CA
Frank's Of Berkeley	Berkeley, CA
Hi-Tech Car Audio	El Cerrito, CA
AC Customz	Richmond, CA
Platinum Auto	Oakland, CA
Marin Auto Stereo & Alarm	San Rafael, CA
Rolling Thunder Car Audio	San Rafael, CA
Sound Innovations	Hayward, CA
Street Beat	Hayward, CA
Autosonic	Novato, CA
Kustom Kar Audio	Petaluma, CA
Pierson's Auto Stereo	Livermore, CA
Audio And Performance Systems	Fairfield, CA
California Car Sounds Inc.	Campbell, CA
Caracoustics	Campbell, CA
Cartronics	Santa Rosa, CA

4. Venue is proper in this District pursuant to 28 U.S.C. § 1400(a) because Defendant is doing continuous business in this District, Defendant or its agent may be found in this District, and a substantial part of the events giving rise to the claims described herein, including acts of

infringement, occurred in this District.

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INTRADISTRICT ASSIGNMENT

5. Pursuant to Local Rule 3-2(c), Intellectual Property Actions shall be assigned on a district-wide basis.

PARTIES

- 6. Corbis is a Nevada corporation with a principal place of business at 902 Broadway, New York, New York.
- 7. Upon information and belief, MobileToys is a Delaware corporation with a principal place of business at 88 Essex Street, F14, Haverhill, Massachusetts.

BACKGROUND

- 8. Corbis is in the business of licensing photographs and fine art images on behalf of itself and the photographers and other licensors it represents. Corbis offers a preeminent collection of more than 100 million creative, entertainment and historic images and serves more than 50 countries worldwide. Generally, the images in Corbis' collections were taken by professional photographers who earn most or all of their livelihoods from the licensing fees Corbis is able to obtain for their images. Corbis' collections highlight well-known photographers and some of the most recognized images in contemporary society, including cutting-edge contemporary creative imagery, and images from cultural institutions, museums and photojournalists. Its customers include thousands of leading print, interactive and broadcast advertising agencies, direct marketing agencies, corporations, small and medium sized businesses, publishers and media companies.
- 9. The images in Corbis' collection are the subject of copyright protection under the laws of the United States. Corbis has protected the images in its collection and subject of this action by systematically registering the copyrights thereto.
- 10. Corbis owns and operates a website located at the Internet address www.corbis.com ("Corbis Website"). At the Corbis Website, users are able to search hundreds of thousands of images from Corbis' collection and then pay to license the images for specific uses.
- 11. Upon information and belief, MobileToys owns, operates, and maintains a website PLAINTIFF CORBIS' COMPLAINT FOR 3 COPYRIGHT INFRINGEMENT AND

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located at www.mobiletoys.net and a website located at www.soundsolutionscorp.com ("MobileToys and SoundSolutions Websites"). The MobileToys and SoundSolutions Websites, which are highly interactive and transmitted nationwide via the Internet, advertise, sell, and otherwise offer MobileToys' products and services.

- 12. Upon information and belief, in or around January 2003 and on various other occasions, Defendant copied and/or uploaded the Corbis images onto the MobileToys and SoundSolutions Websites, without authorization, and without paying for the required commercial license fees.
- The same Corbis images were reproduced, displayed and distributed to the public 13. on the MobileToys and SoundSolutions Websites as part of that site's marketing and advertising material in an effort to attract business from those visiting the cite.
- 14. Attached as Exhibit A is a representative, non-exhaustive sample of true and correct copies of presently known Corbis images registered with the Copyright Office ("Corbis Images"), with screen shots taken from the MobileToys and SoundSolutions Websites depicting some of Defendant's unauthorized uses of the Corbis Images.
- 15. In or around October 22, 2007, Corbis provided written notice advising MobileToys of its unauthorized use of the Corbis Images.
- 16. In response to such notice, MobileToys failed to produce any evidence of valid licenses for the hundreds of unauthorized uses on the MobileToys and SoundSolutions Websites.
- 17. Attached as Exhibit B is a chart identifying the United States Copyright Office registration certificate numbers and registration dates for the Corbis Images displayed in Exhibit A, evidencing that Corbis owns or controls the registered copyrights to these images that were copied and displayed on the MobileToys and SoundSolutions Websites.

FIRST CAUSE OF ACTION COPYRIGHT INFRINGEMENT [17 U.S.C. § 501]

18. Corbis repeats and realleges the allegations of paragraphs 1 through 16 as if fully set forth herein.

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- 19. Corbis holds valid copyright registrations to the Corbis Images that are the subject of this action and that are evidenced by the copyright registration certificates referenced by Exhibit B.
- 20. Defendant reproduced, distributed, displayed, and created derivative works of those Corbis Images for commercial purposes without Corbis' authorization.
- 21. The actions and conduct of Defendant as described above, directly, contributorily, and/or vicariously infringe the exclusive rights of Corbis granted by Section 106 of the Copyright Act, 17 U.S.C. § 106, to display, reproduce, distribute and create derivative works based on Corbis' registered copyrighted works.
- 22. Such actions and conduct by Defendant constitute copyright infringement under Section 501 of the Copyright Act, 17 U.S.C. § 501.
- 23. As a result of the copyright infringement described above, Corbis is entitled to relief against Defendant including, but not limited to, injunctive relief, actual damages and disgorgement of Defendant's profits, or statutory damages, statutory costs and attorneys' fees, and prejudgment interest.

SECOND CLAIM FOR RELIEF REMOVAL OR ALTERATION OF COPYRIGHT MANAGEMENT INFORMATION [17 U.S.C. § 1202]

- 24. Corbis repeats and realleges the allegations of Paragraphs 1 through 22 as if fully set forth herein.
- 25. All of the Corbis Images that are the subject of this lawsuit were displayed on the Corbis Website with corresponding copyright management information ("CMI") indicating Corbis' control of rights in such images.
- 26. Upon information and belief, when Defendant or its agents duplicated and displayed the subject images on the MobileToys Website, it intentionally removed the CMI from each of the original Corbis Images used by Defendant.
- 27. Upon information and belief, when Defendant distributed and publicly displayed the Corbis Images and copies thereof on the Mobile Toys Website, it knew that CMI had been

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removed or altered without authority of Corbis, the entity that controlled the copyrights.

- Defendant knew or had reasonable grounds to know that its conduct specified in 28. the prior two paragraphs would induce, enable, facilitate or conceal Defendant's infringement of copyrights, as described above.
- Defendant's conduct therefore constitutes a violation of the Digital Millennium 29. Copyright Act, 17 U.S.C. § 1202(b).
- As a result of the conduct described above, Corbis is entitled to relief against 30. Defendant, including, without limitation, injunctive relief, actual damages or statutory damages in the amount of up to \$25,000 per violation, statutory costs and attorneys' fees, and prejudgment interest.

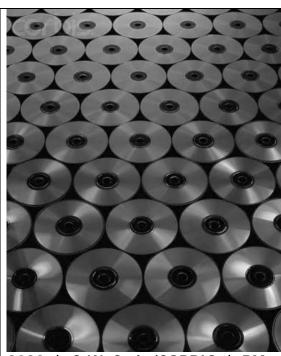
RELIEF REQUESTED

WHEREFORE, Corbis prays for relief as follows:

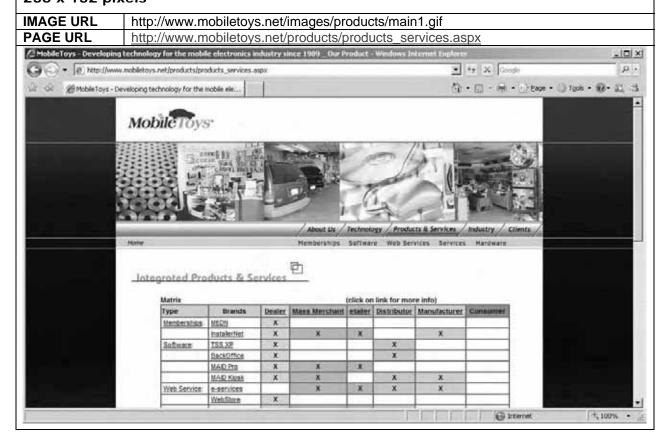
- For orders enjoining Defendant from infringing Corbis' copyrighted images 1. pursuant to Section 502 of the Copyright Act, 17 U.S.C. § 502, and enjoining Defendant from displaying Corbis' copyrighted images pursuant to the DMCA, 17 U.S.C. § 1203(b);
- For an award of Defendant's profits and for damages in such amount as may be 2. found, or for statutory damages of (a) not less than \$750 or more than \$30,000 per image pursuant to 17 U.S.C. § 504(c)(1) or, upon a finding of willful infringement pursuant to 17 U.S.C. § 504(c)(2), up to \$150,000 per image, and (b) not less than \$2,500 or more than \$25,000 per image pursuant to 17 U.S.C. § 1203(c)(3)(B);
 - 3. For an award of costs, pursuant to 17 U.S.C., Sections 505 and 1203(b)(4);
- For an award of reasonable attorneys' fees, pursuant to 17 U.S.C., Sections 505 4. and 1203(b)(5);
 - 5. For an award of prejudgment interest on the amount of any award to Plaintiff; and

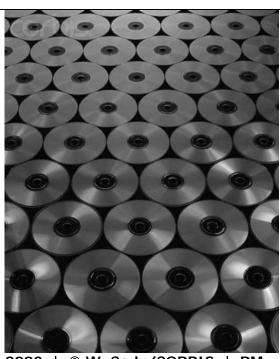
Case 5:07-cv-05910-J	W Document 1	Filed 11/21/2007	Page 7 of 210	
6. For such other and further relief as the Court deems just and equitable.				
JURY TRIAL DEMAND				
Plaintiff Corbis hereby requests a trial by jury of all issues so triable.				
Dated: November 21,	2007	FENWICK & WEST	T LLP	
By: Laurence F. Pulgram				
Attorneys for Plaintiff CORBIS CORPORATION				
23819/00401/LIT/1276431.3				

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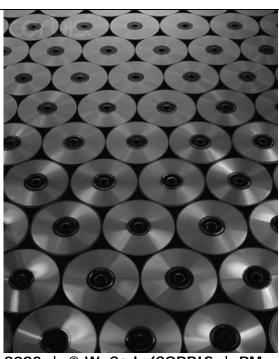
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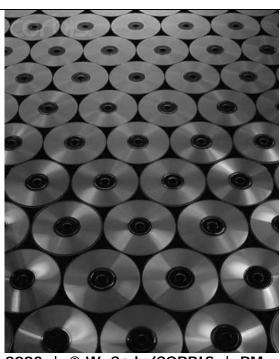
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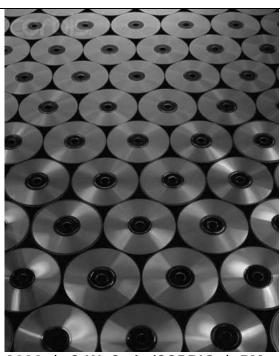
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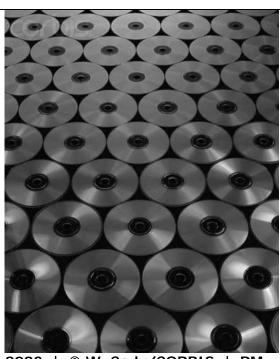
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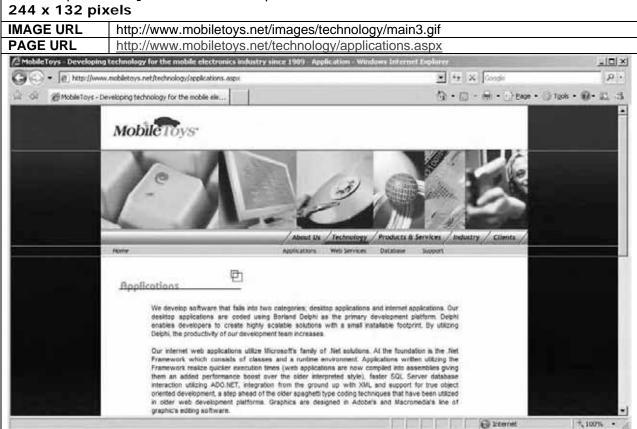


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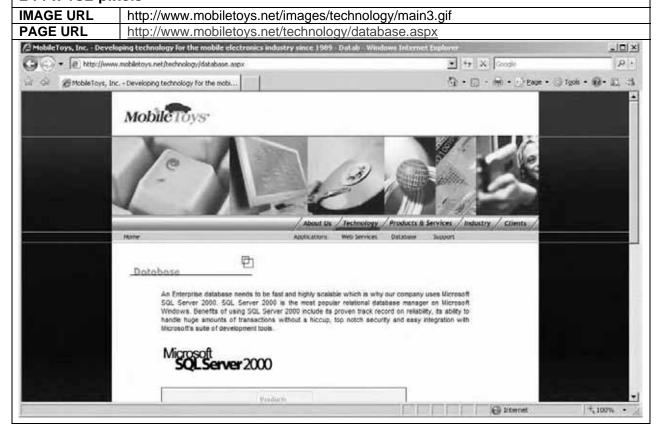


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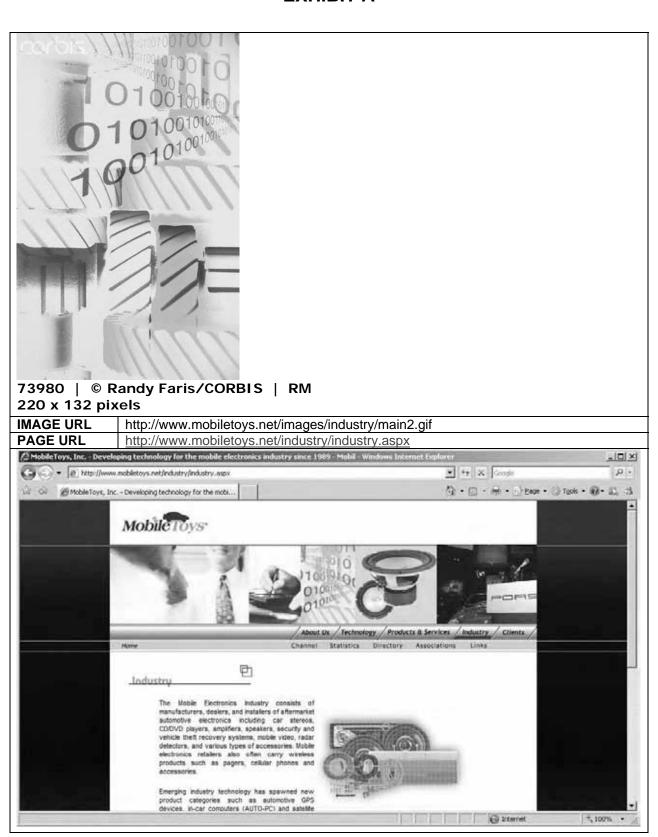
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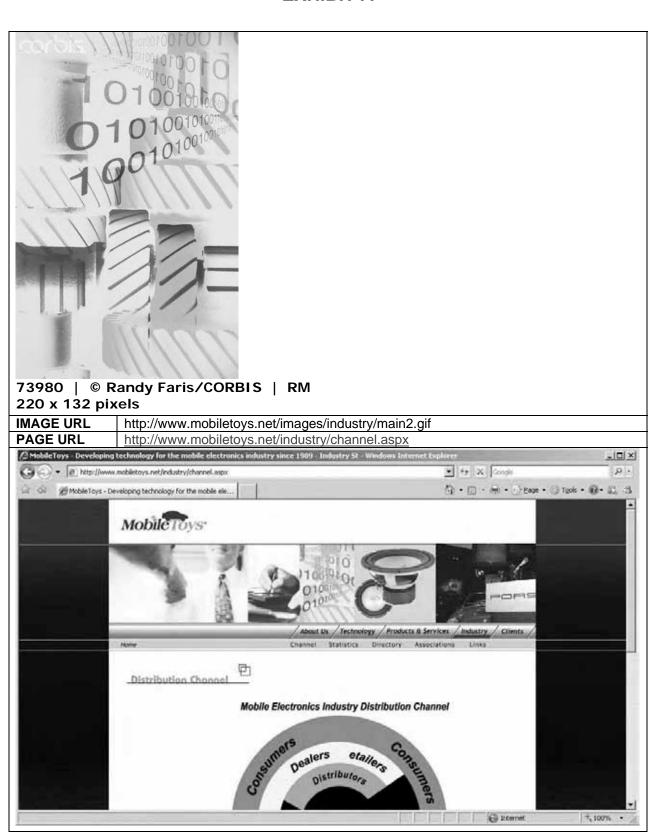


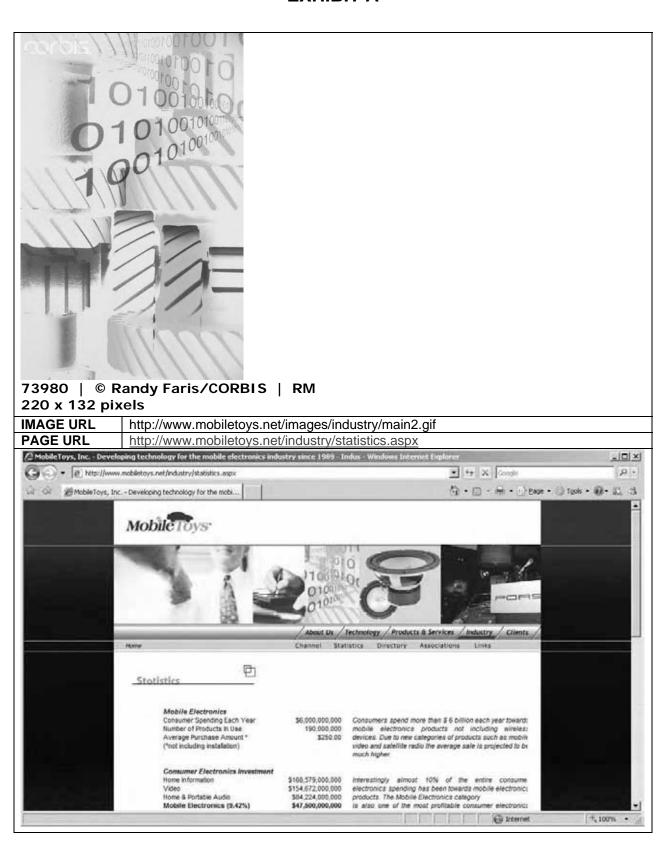


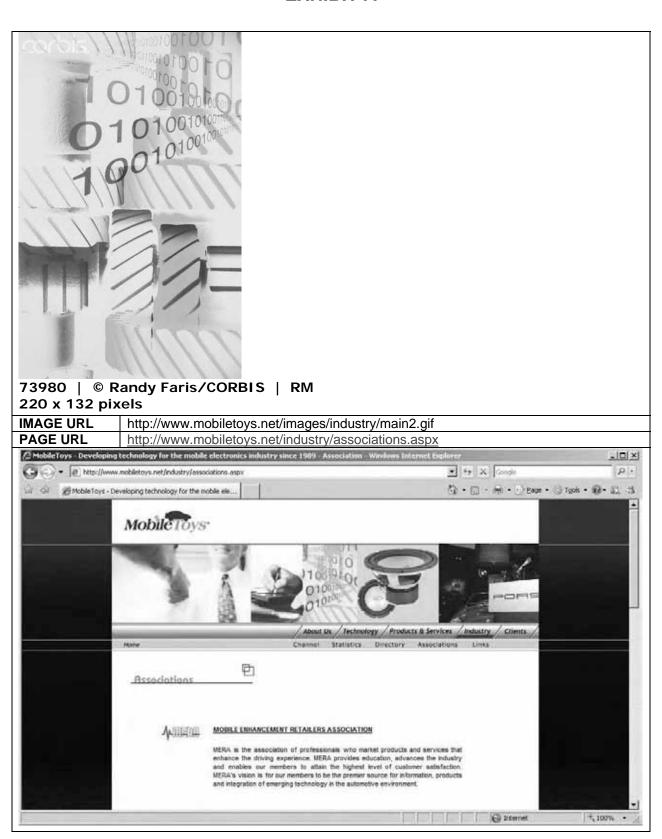
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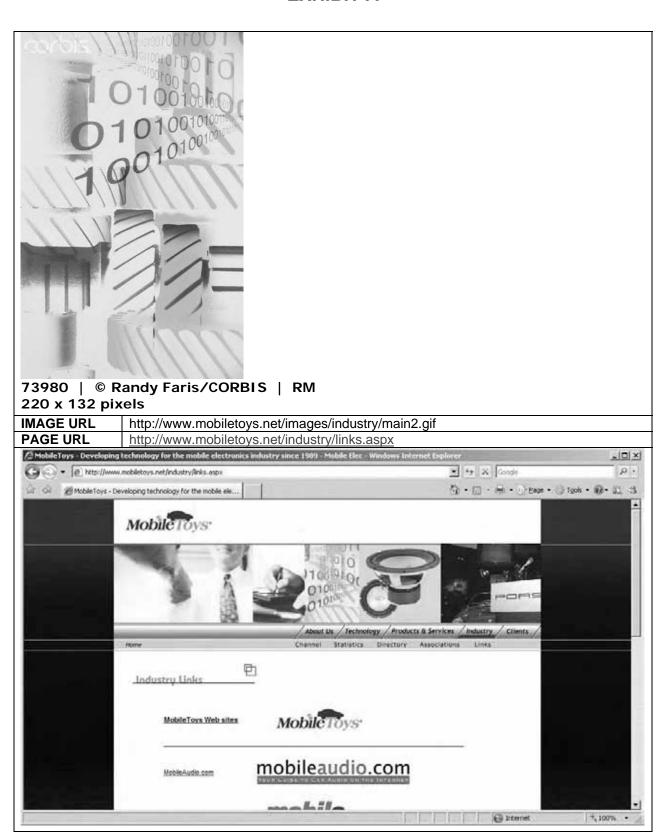


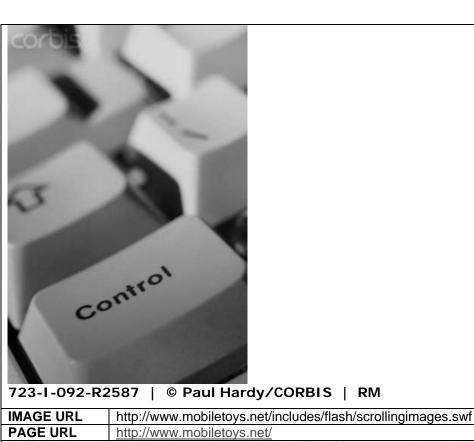




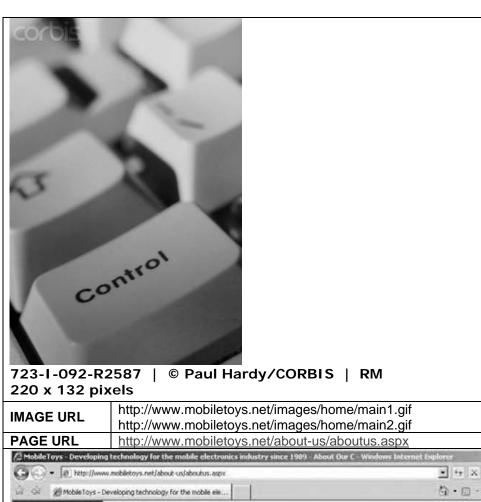




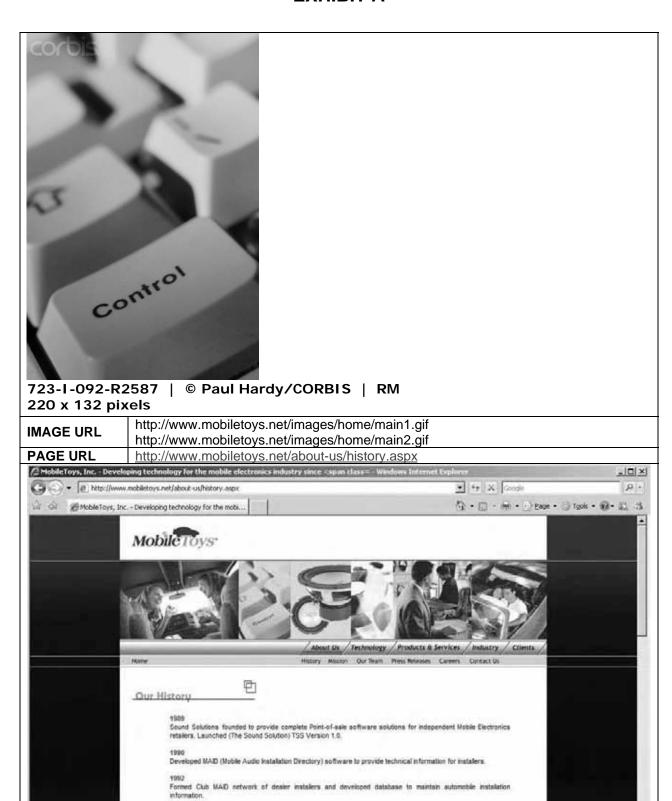








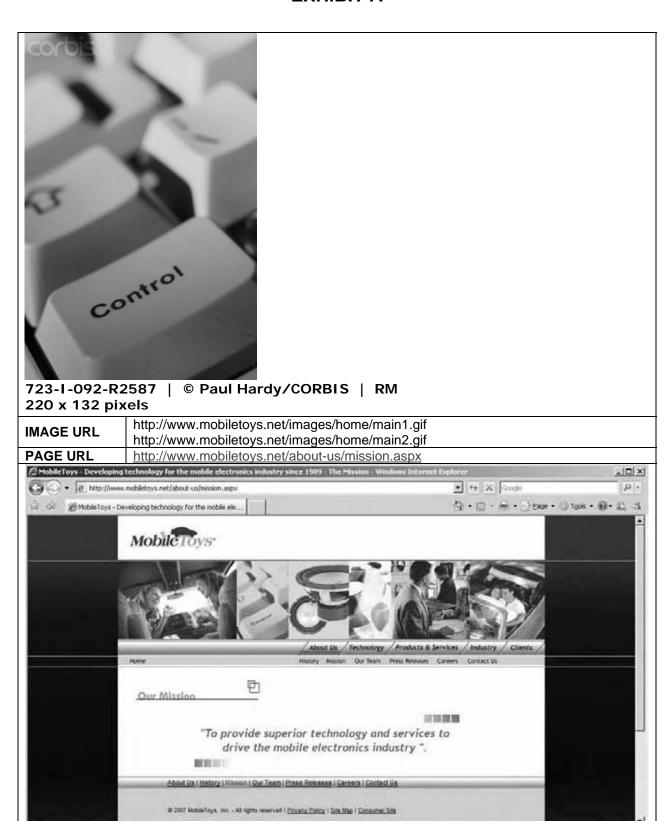




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1994 Sears buys the MAD for 750 stores Nationwide, TSS & MAD users exceed 500.



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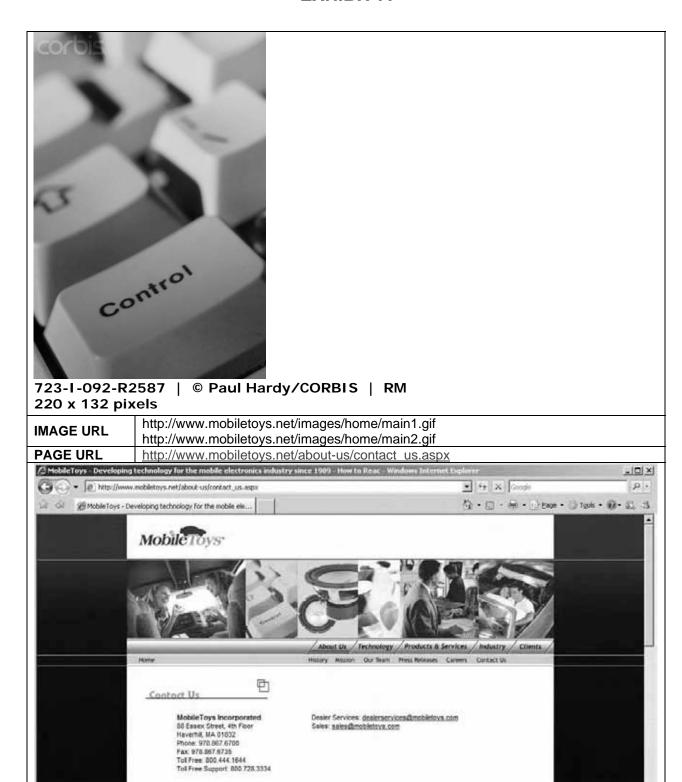


723-I-092-R2587 | © Paul Hardy/CORBIS | RM 220 x 132 pixels

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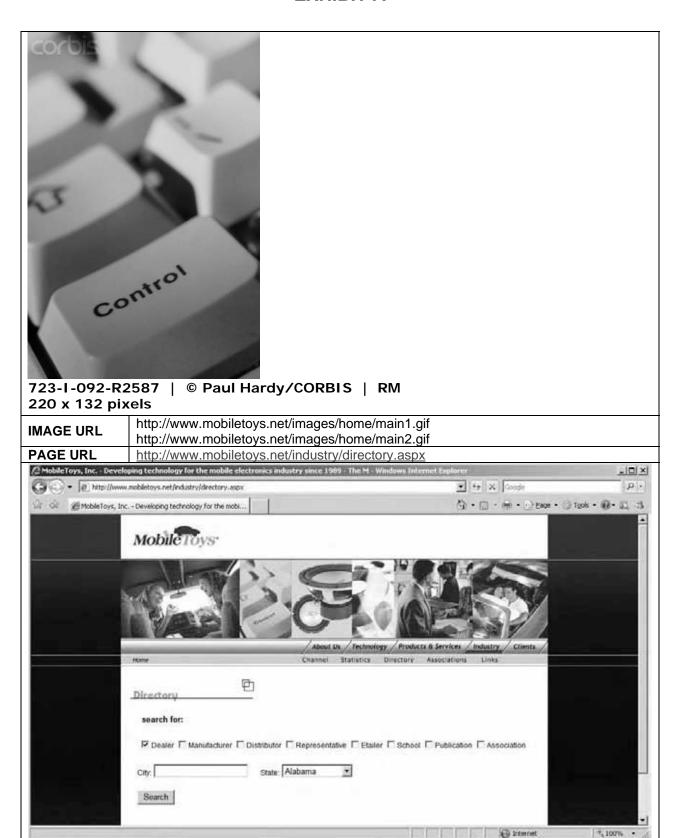




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MobileTays Inc. is located off of Route 495, exit 49 heading north.





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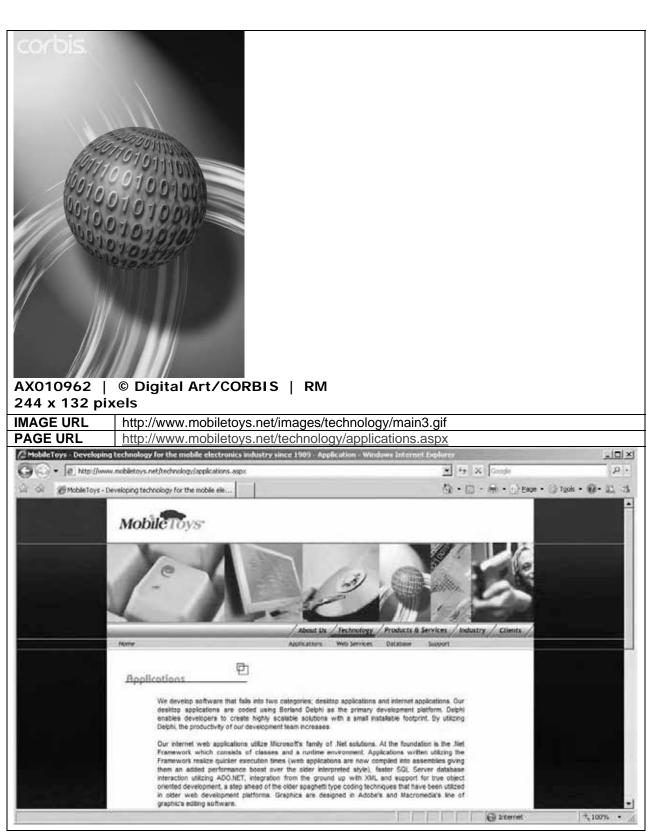
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IMAGE URL http://www.mobiletoys.net/images/technology/support.jpg **PAGE URL** http://www.mobiletoys.net/technology/support.aspx 🗥 MobileToys - Developing technology for the mobile electronics industry since 1989 - Except • 49 X Google p. http://www.mobiletoys.net/technology/support.aspx (i) A MobileToys - Developing technology for the mobile ele... (A · □ · m · □ Bage · □ Tgols · @ · 12, 3 About Us / Technology / Products & Services / Industry / Clients Applications Web Services Database Support 中 Support Developing a highly usable software program is only half the battle. After the software product is out in the field, if is equely important to be available whenever a customer has a question. With a first class help desk run by people who have been involved with help desk support for many years, we are able to offer our customers a multi-level support team which allows help deak tokets to be resolved quickly, usually answering a customer's question the first time, eliminating the need for multiple call backs and re-hashing of the problem to other fech support members. What makes us unique is not only do we extend ourselves through a tall thee 1-500 support line, but we also offer assistance through email. ACL Messenger and on site visits. We strive to offer a top notch help Desk/Support team that is committed to answering any questions you may have in the shortest time frame possible. Courtesy Support Service www.tasheb.com

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@ 2007 ManieTeys, Inc. - All rights reserved | <u>Enurgy Policy</u> | <u>Site Map | Consumer Site</u>

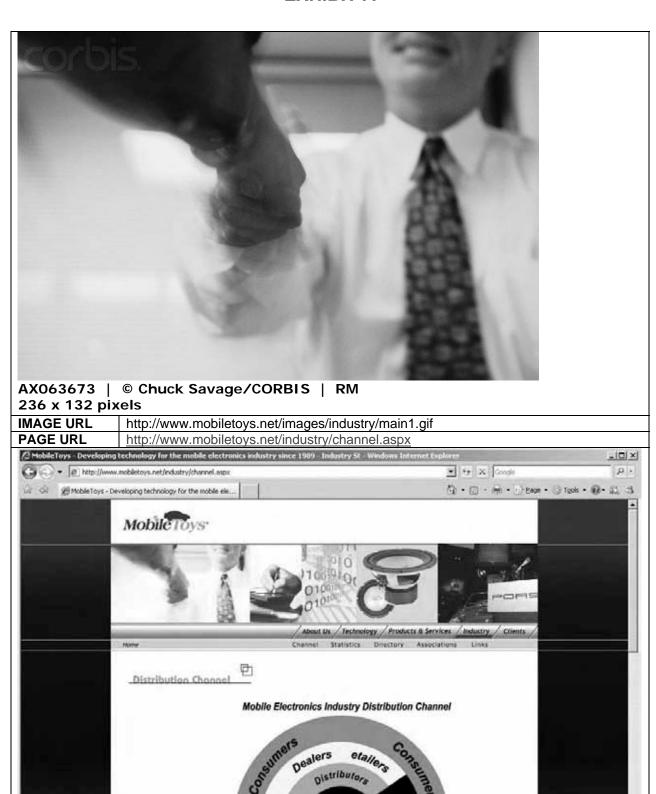


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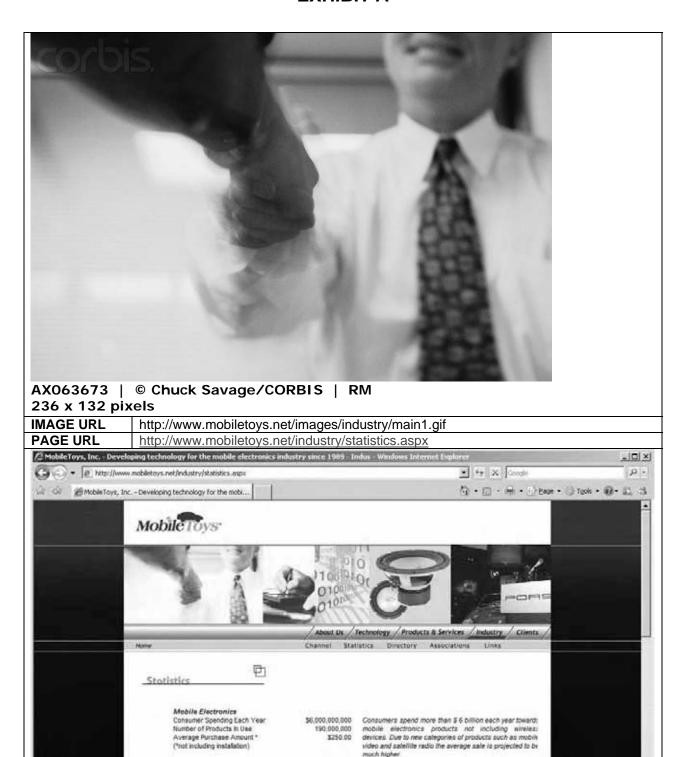
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Emerging industry technology has spawned new product categories such as automotive GPS devices. In-car computers (AUTD-PC) and satellite



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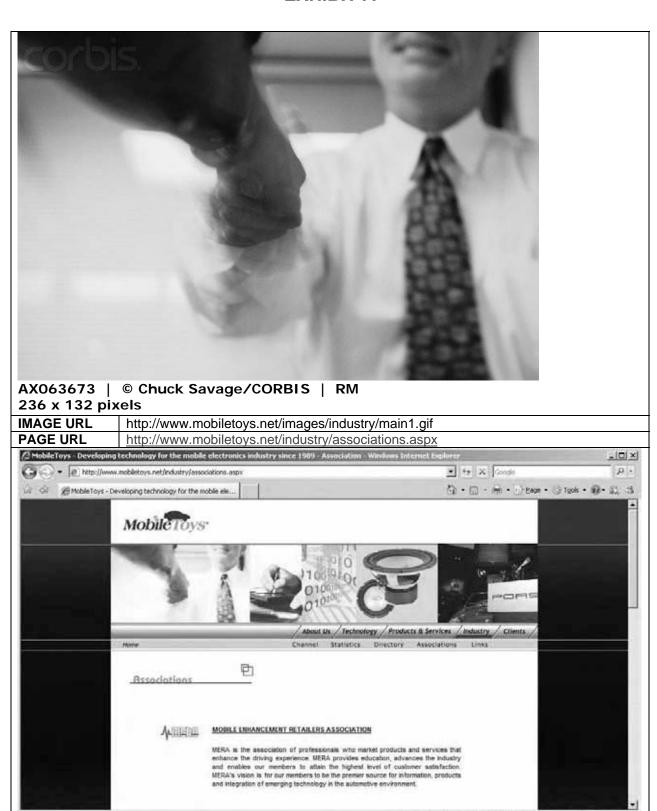
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Interestingly almost 10% of the entire consume electronics spending has been towards mobile electronics products. The Mobile Electronics category is also one of the most profitable consumer electronics.

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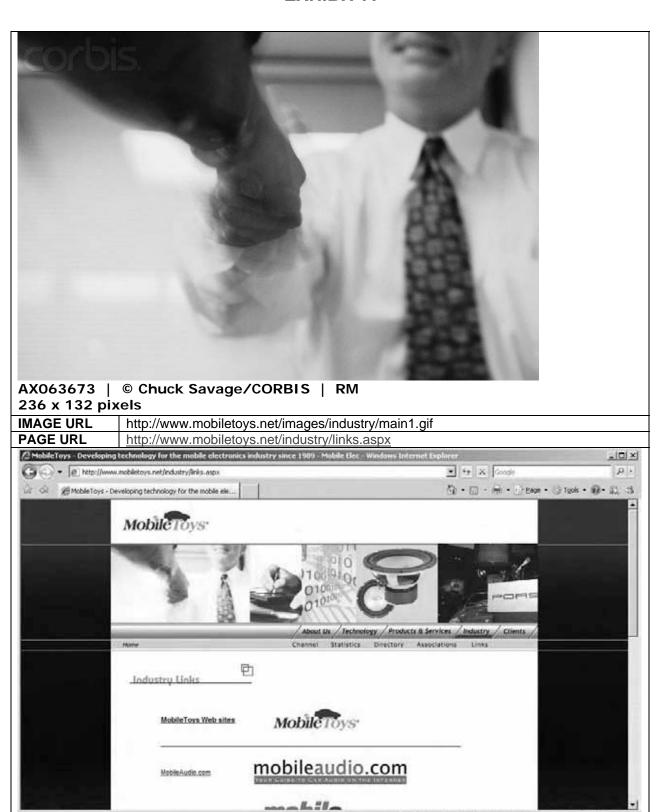
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Consumer Electronics Investment Home information Video Home & Portable Audio Mobile Electronics (9.42%)



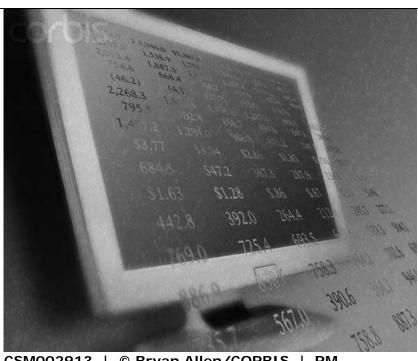
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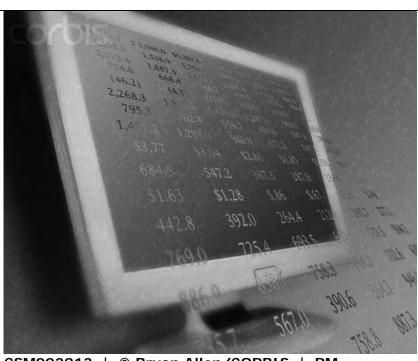
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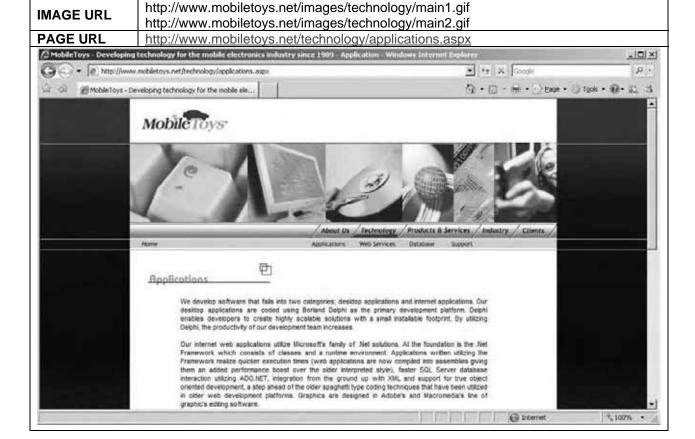
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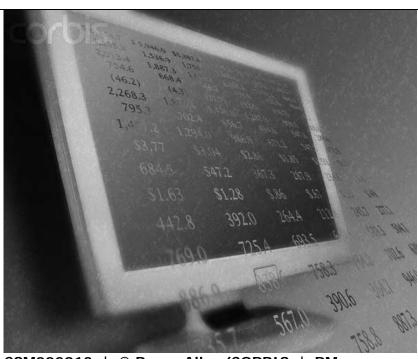






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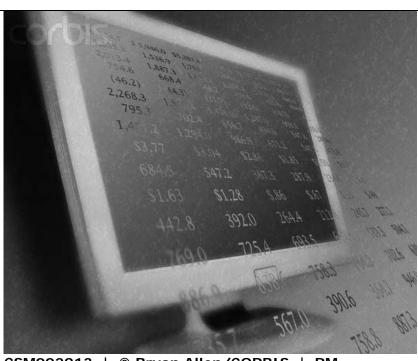


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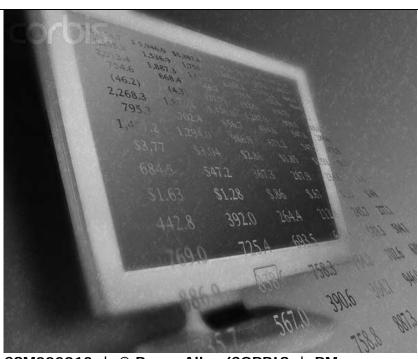




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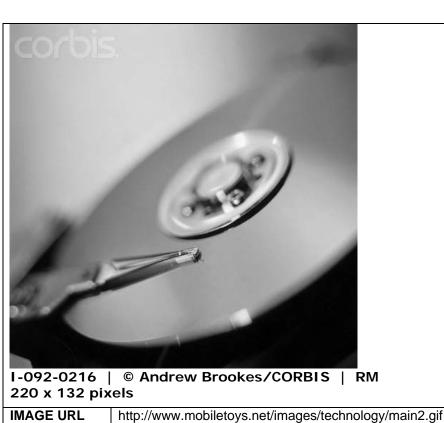
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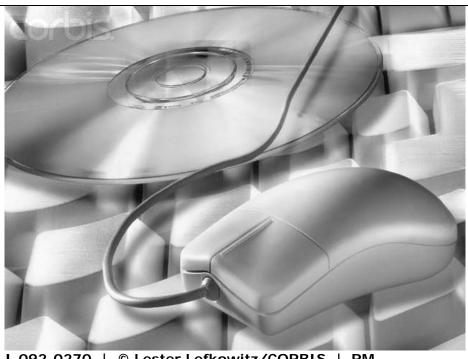






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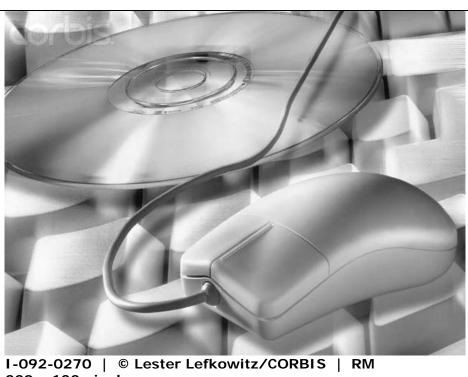
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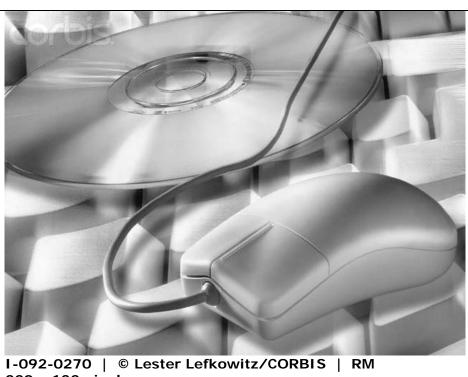
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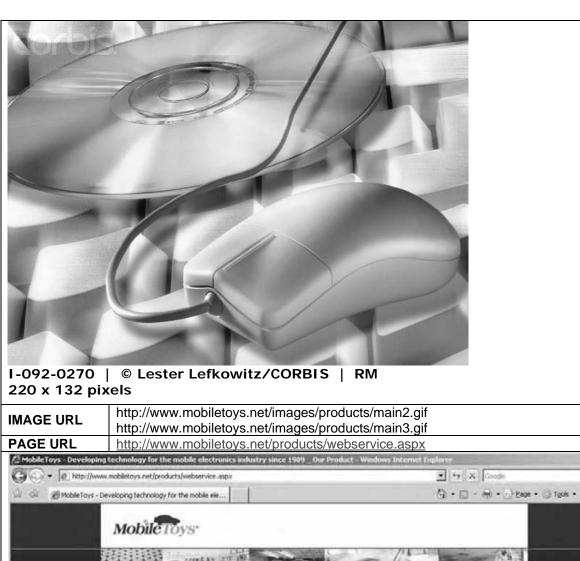




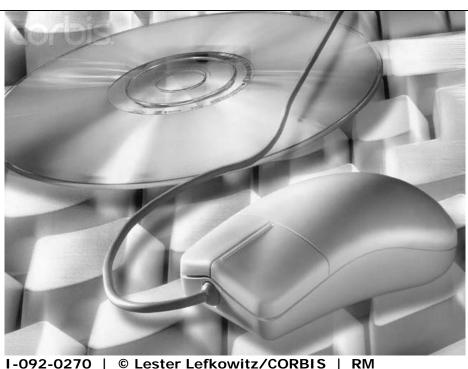
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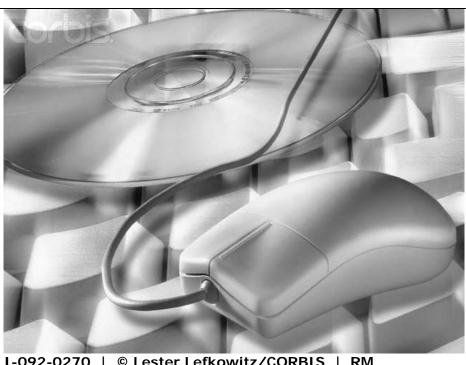


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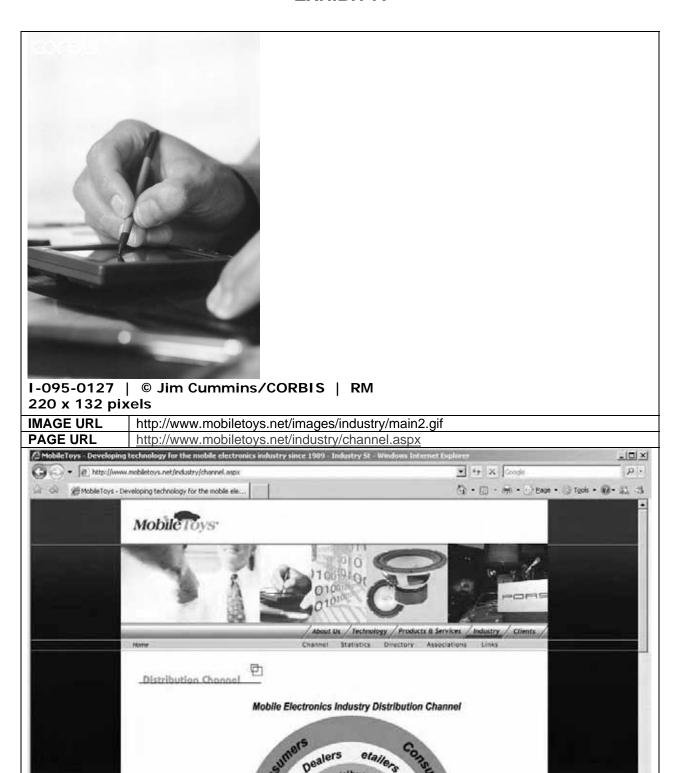
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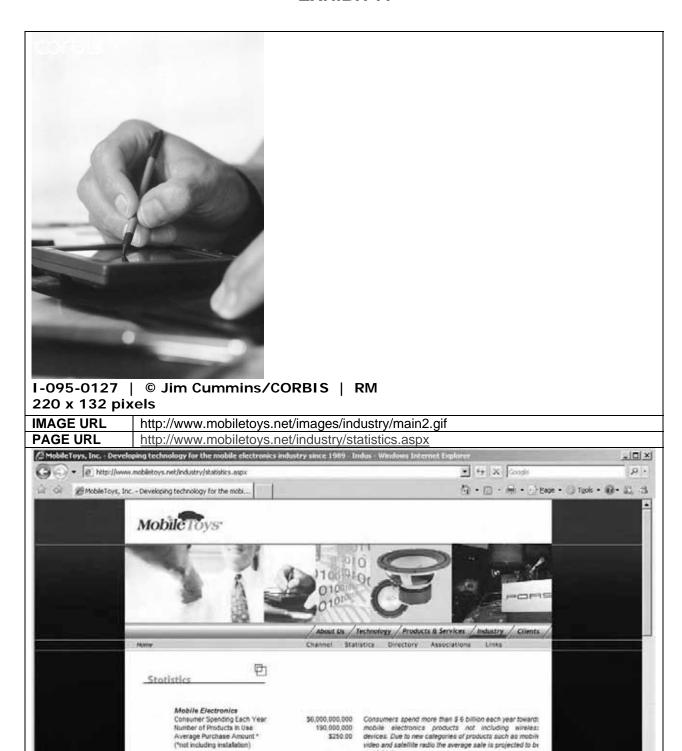


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220 x 132 pixels IMAGE URL http://www.mobiletoys.net/images/industry/main2.gif **PAGE URL** http://www.mobiletoys.net/industry/industry.aspx 🛆 MobileToys, Inc. - Developing technology for the mobile electronics industry since 1989 -(a) http://www.mobiletoys.net/industry/industry.aspx ₩ 69 X Google (A MobileTays, Inc. - Developing technology for the mobil... 1 · □ · ← · ⊕ Page · ⊕ Tgols · ② · □ · □ · □ Mobile Toys About Us / Technology / Products & Services / Industry / Clients Channel Statistics Directory Associations Links Industry The Mobile Electronics Industry consists of manufacturers, dealers, and installers of affermarket submotive electronics including car stereos, CD/CVD players, amplifiers, speakers, security and vehicle that recovery systems, mobile video, radar detectors, and various types of accessories. Mobile controllers and various types of accessories. Mobile detectors and various types of accessories. electronics retailers also often carry wireless products such as pagers, cellular phones and accessories. Emerging industry technology has spawned new product categories such as automotive GPS devices. In-car computers (AUTD-PC) and satellite @ Internet 7,100% -



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\$168,579,000,000 \$154,672,000,000 \$84,224,000,000 \$47,500,000,000

Consumer Electronics Investment Home information Video Home & Portable Audio Mobile Electronics (9.42%) much higher

Interestingly almost 10% of the entire consume electronics spending has been towards mobile electronics products. The Mobile Electronics category is also one of the most profitable consumer electronics.

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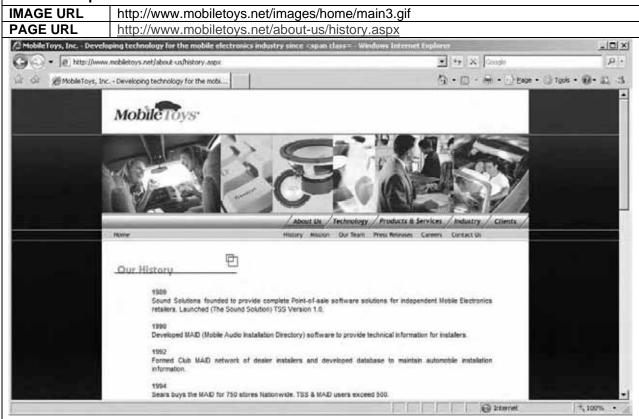


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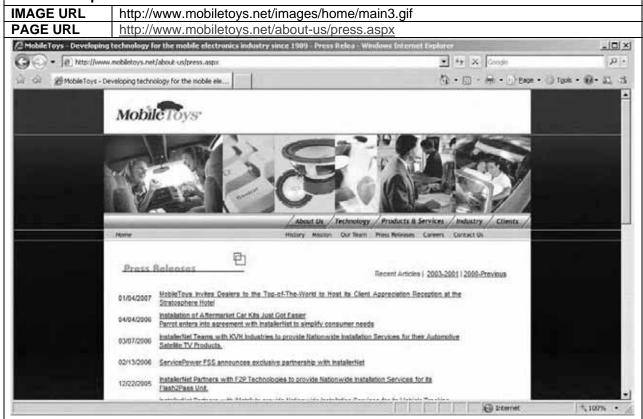


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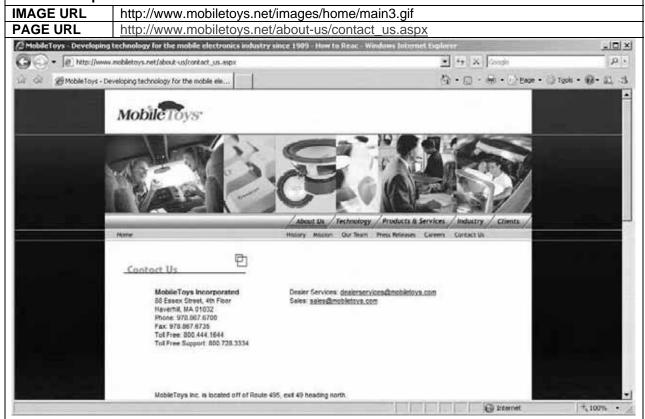


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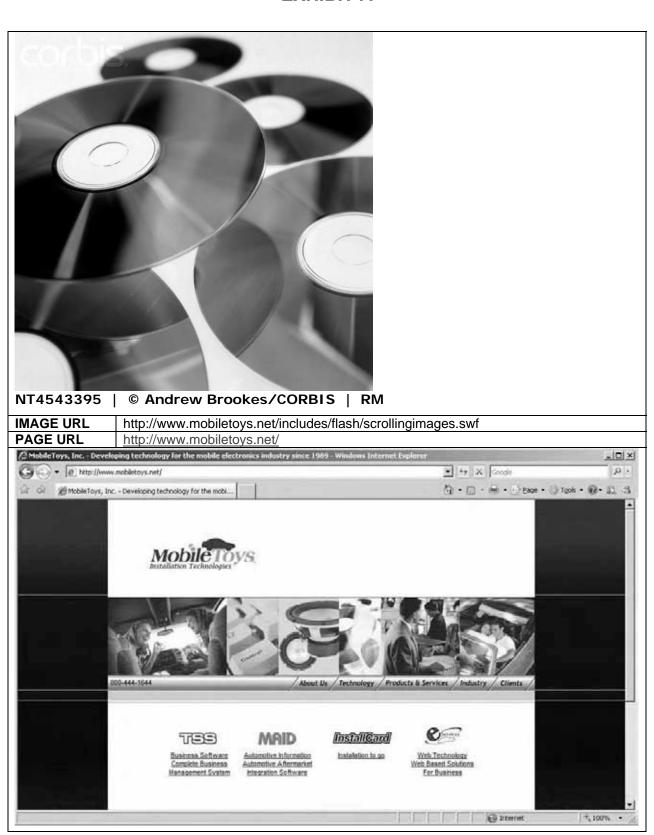
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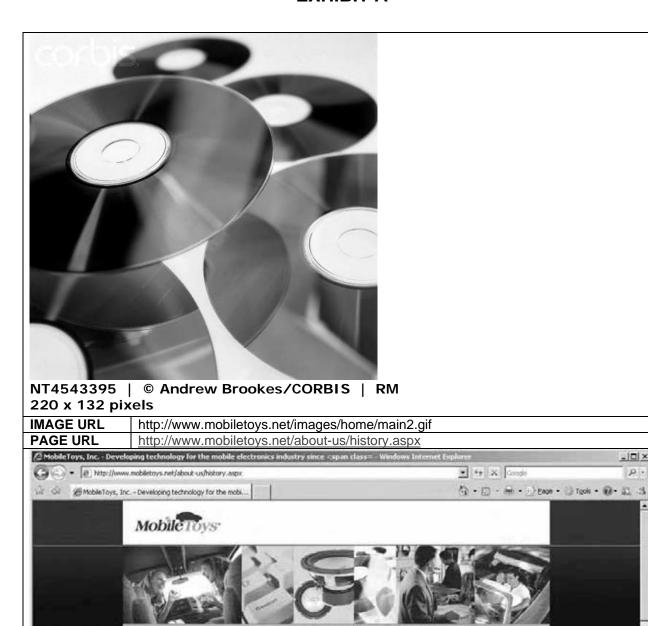
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1988
Sound Solutions founded to provide complete Point-of-sale software solutions for independent Mobile Electronics retailors, Launched (The Sound Solution) TSS Version 1.0.

Formed Club MAID network of dealer installers and developed database to maintain automobile installation

Developed MAID (Mobile Audio Installation Directory) software to provide technical information for installers.

1994 Sears buys the MAID for 750 stores Nationwide, TSS & MAID users exceed 500

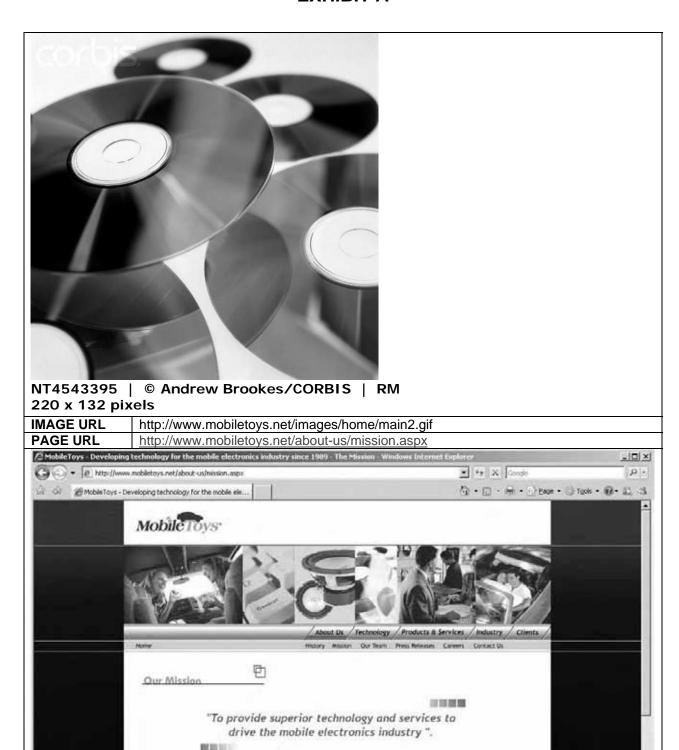
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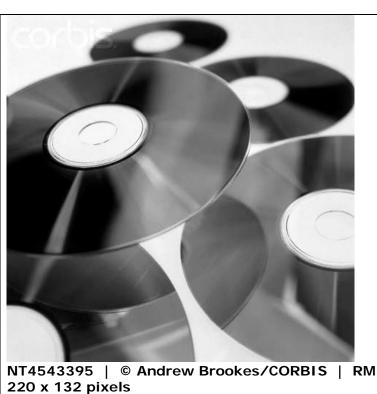


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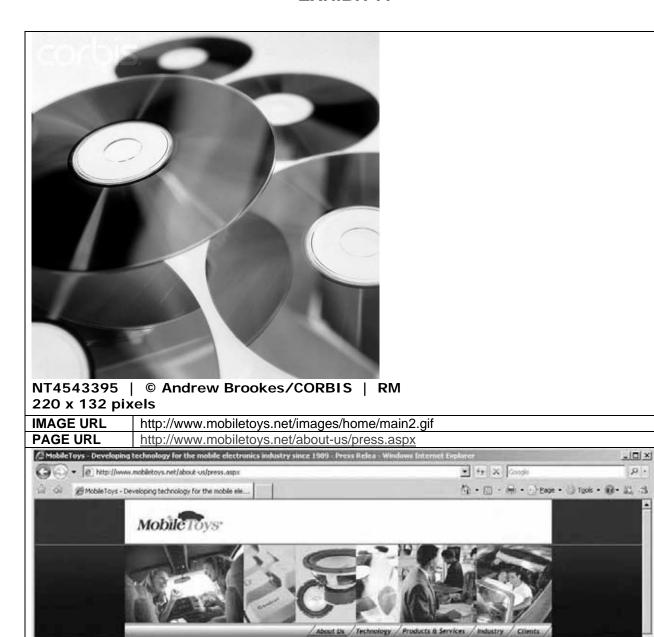
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03/07/2006 InstallerNet Teams, with KVH Industries to provide Nationwide Installation Services for their Automotive Satellite TV Products.

12/22/2005 InstallerNet Partners with F2P Technologies to provide Nationwide Installation Services for its Flash2Pass Unit.

04/04/2006 Installation of Aftermarket Car Kits Just Got Easier Parrot enters into agreement with installerhiet to simplify consumer needs

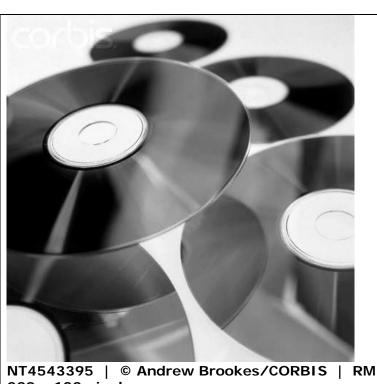
02/13/2006 ServicePower FSS announces exclusive partnership with installer/list

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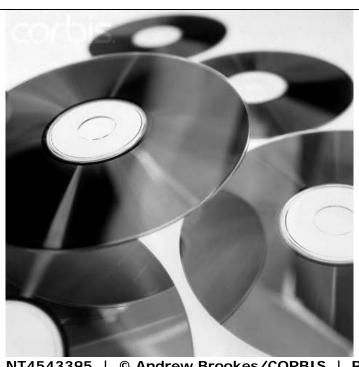
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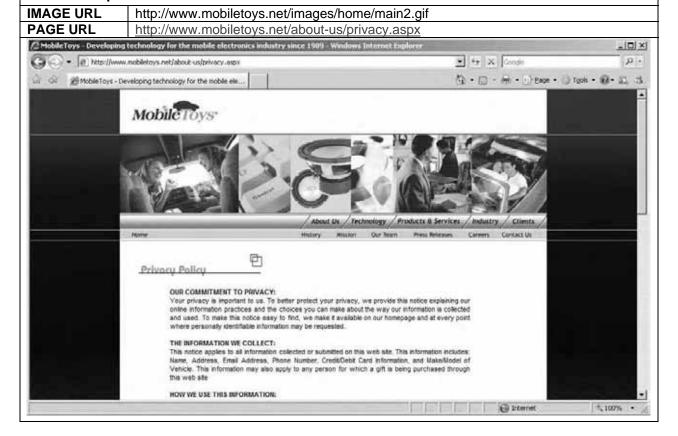


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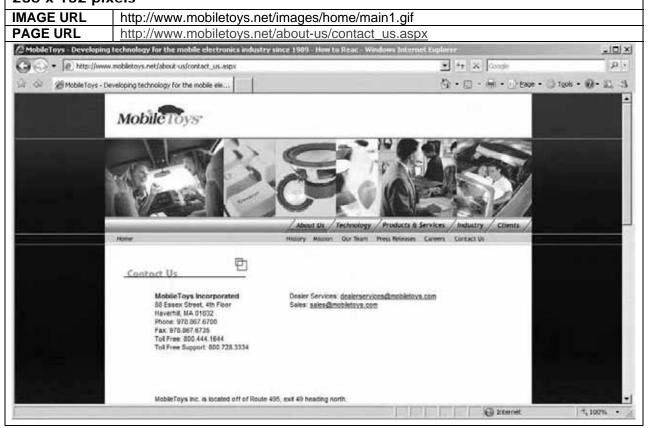


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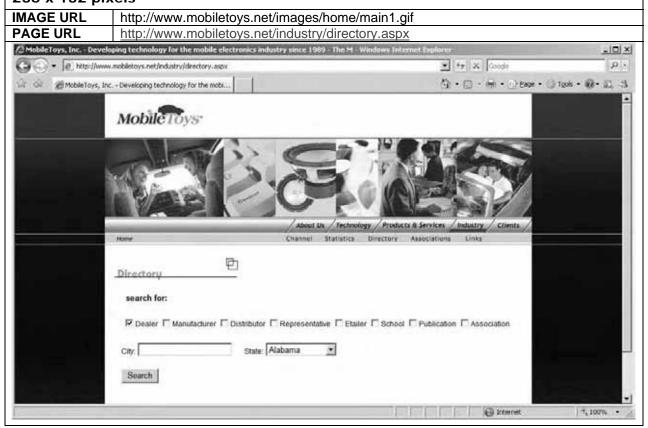


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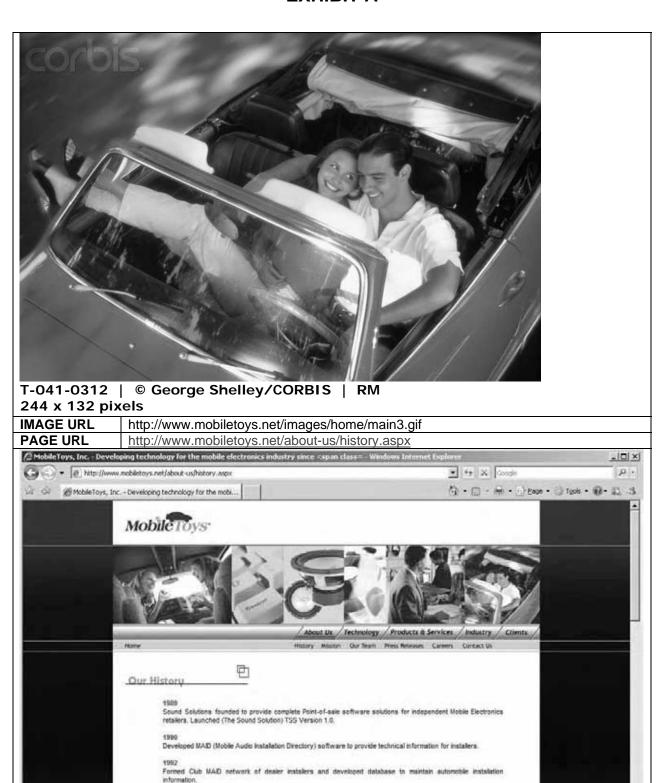
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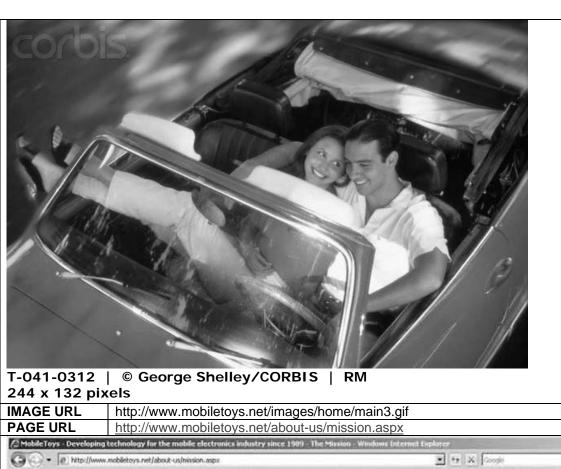




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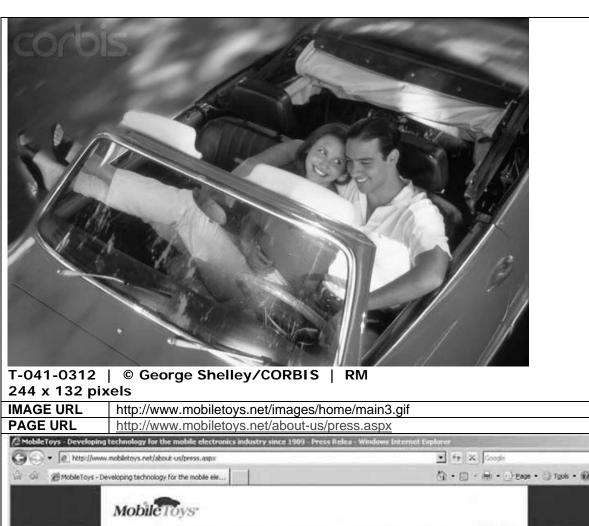






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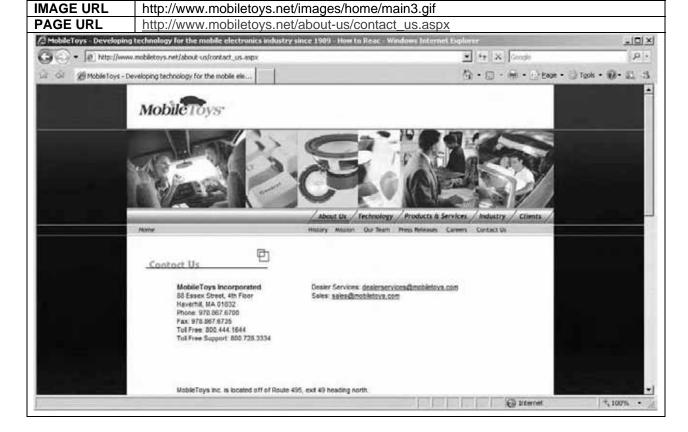


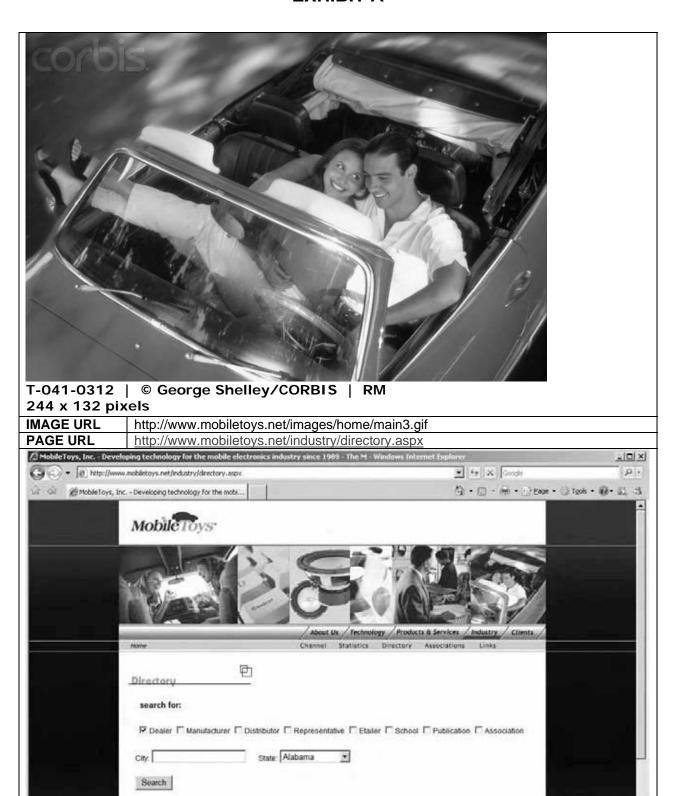






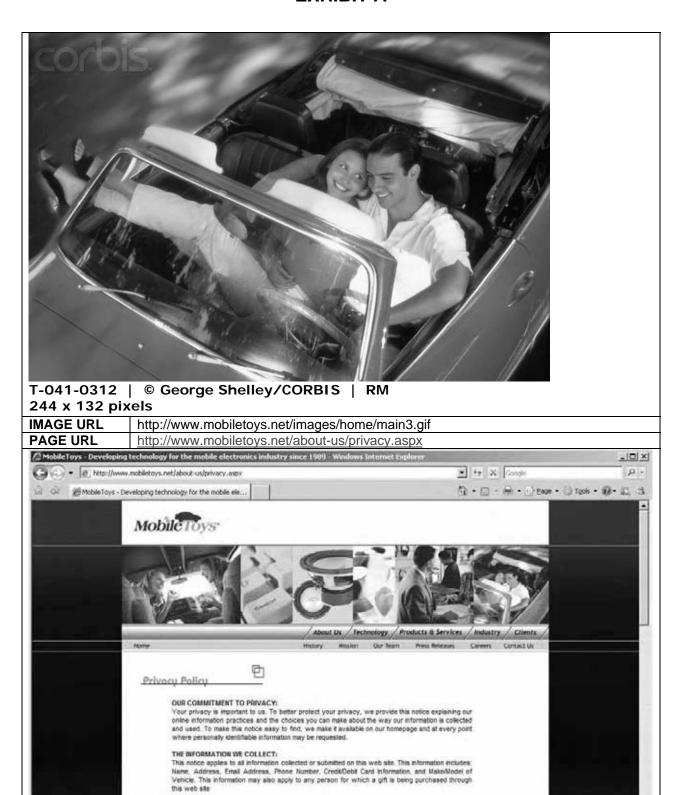
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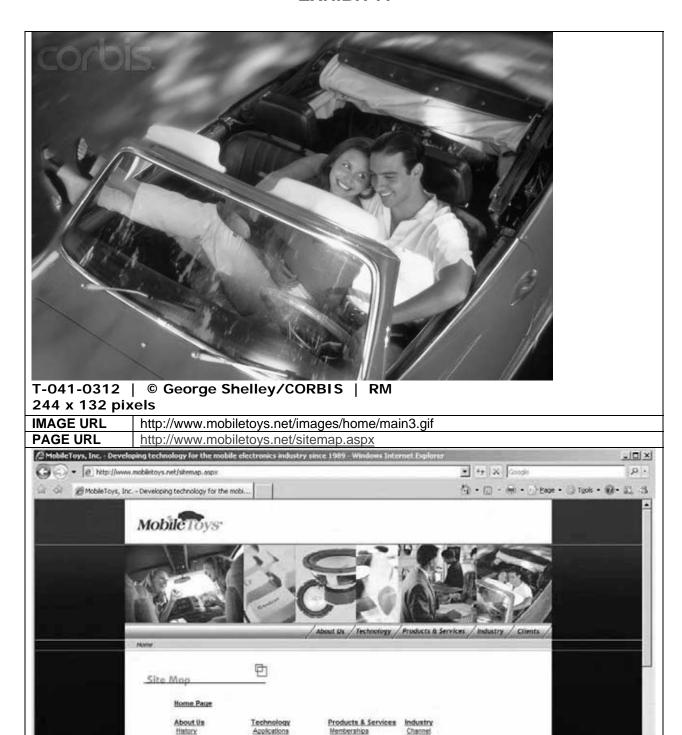
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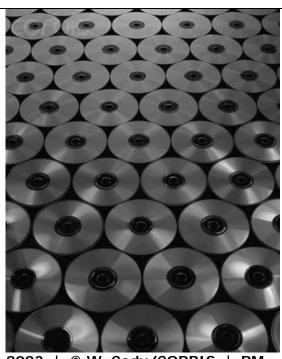
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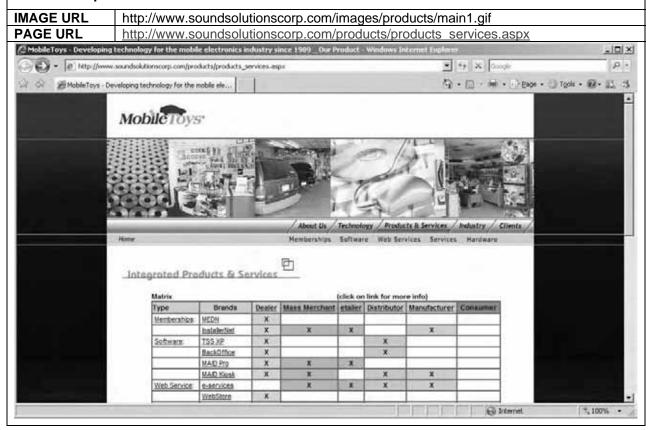
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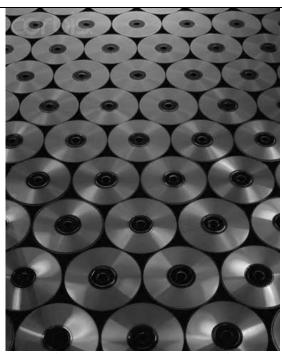
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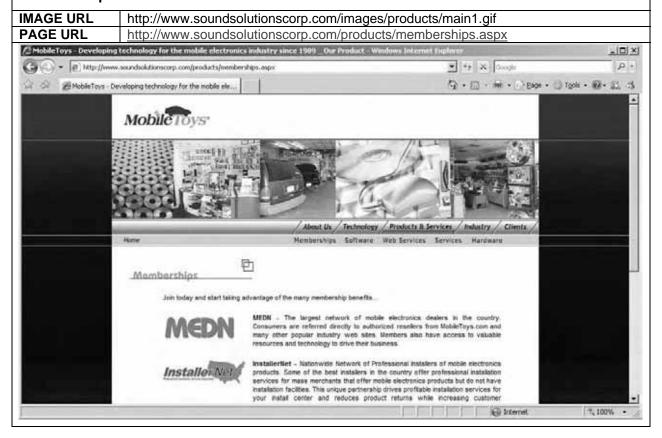


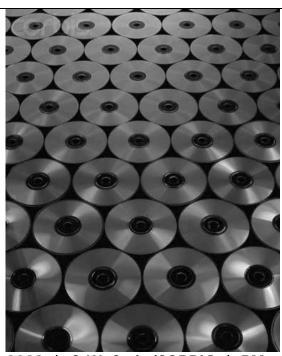
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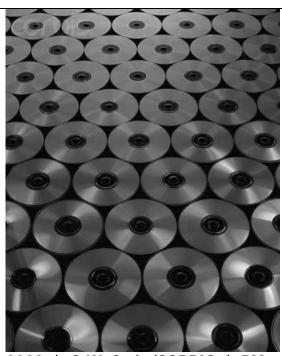
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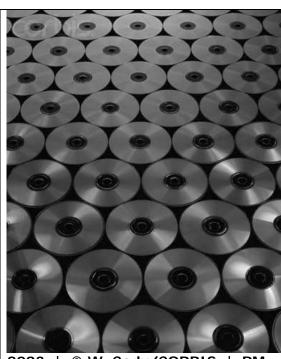
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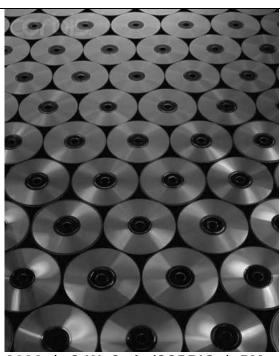
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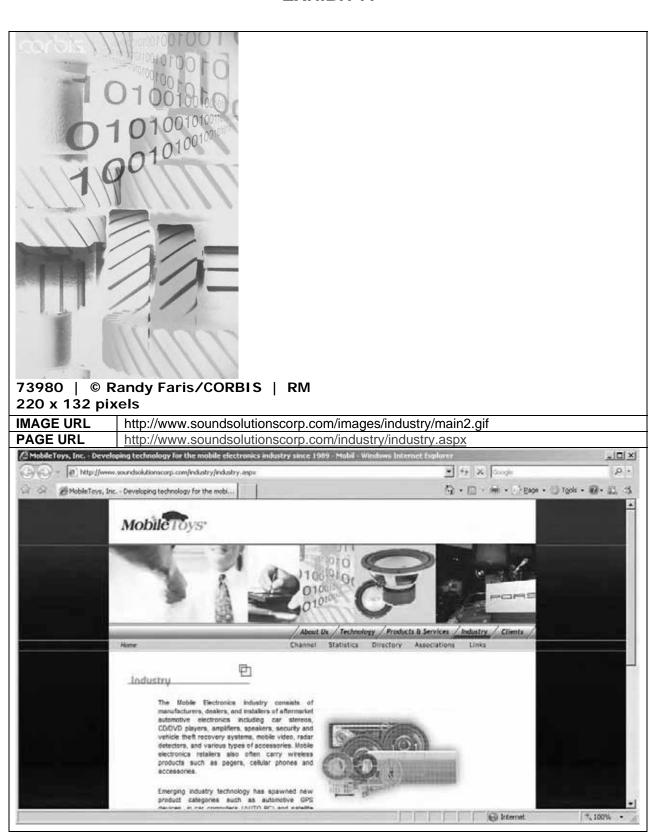
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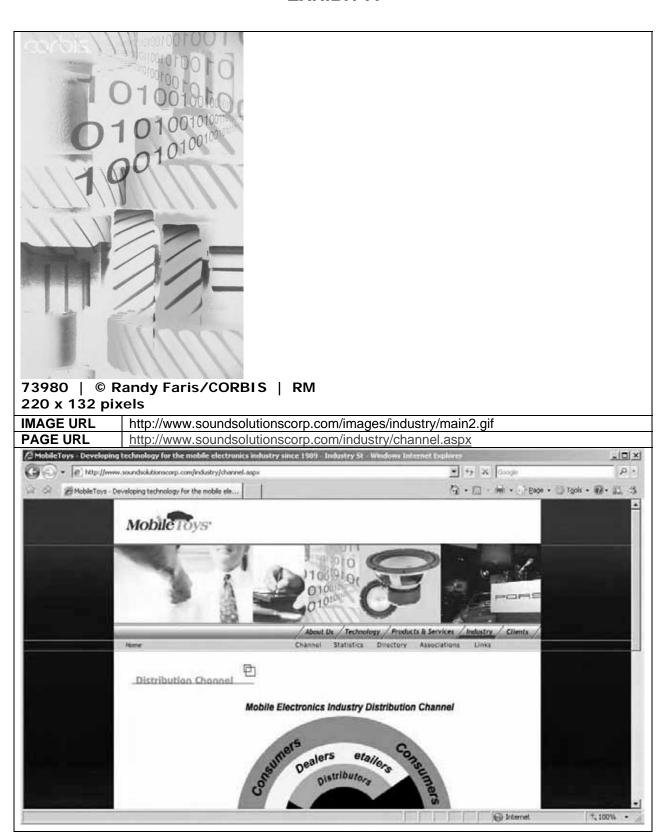


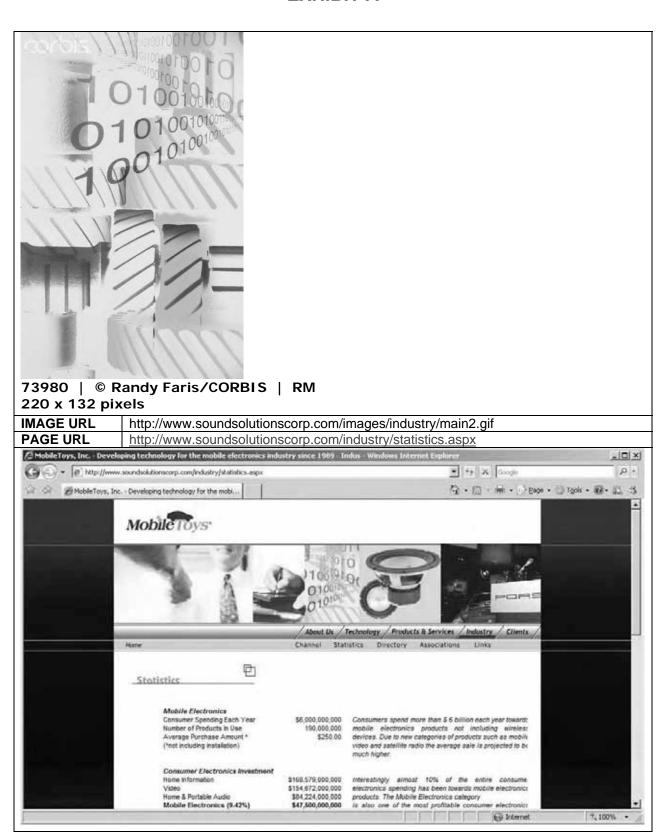


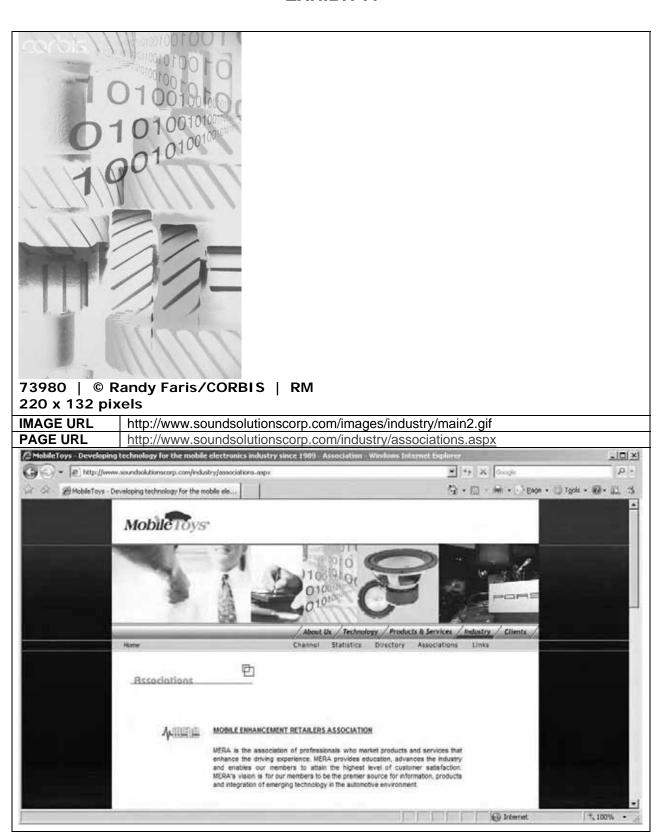
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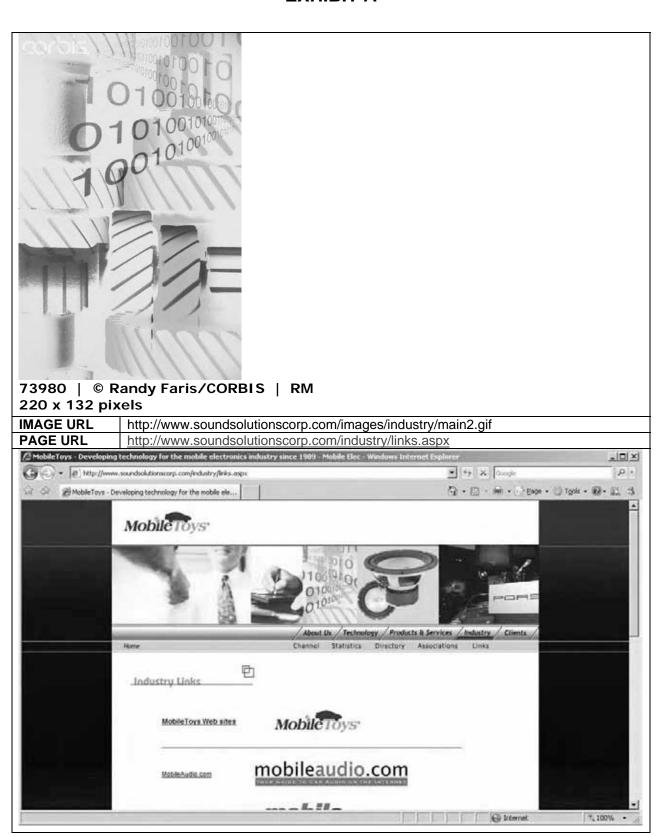


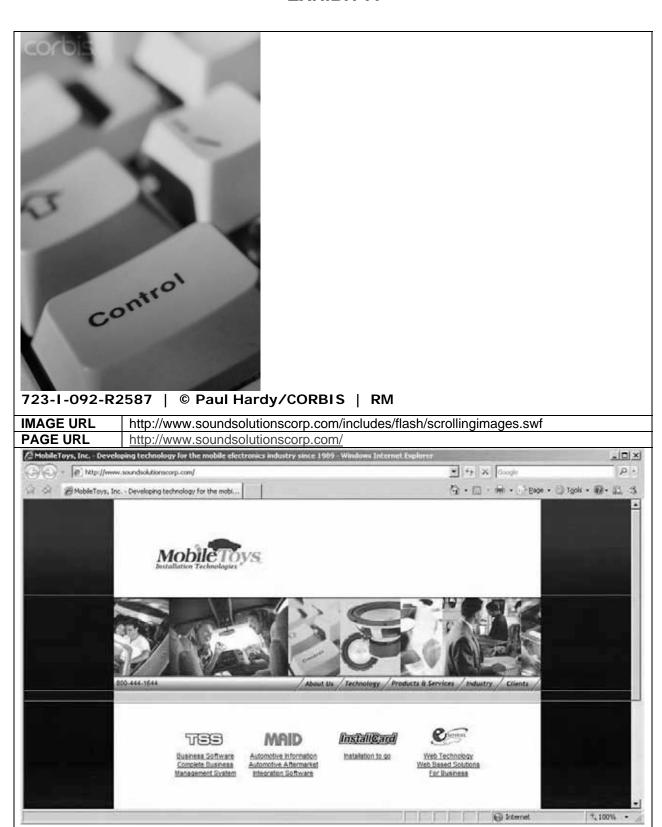


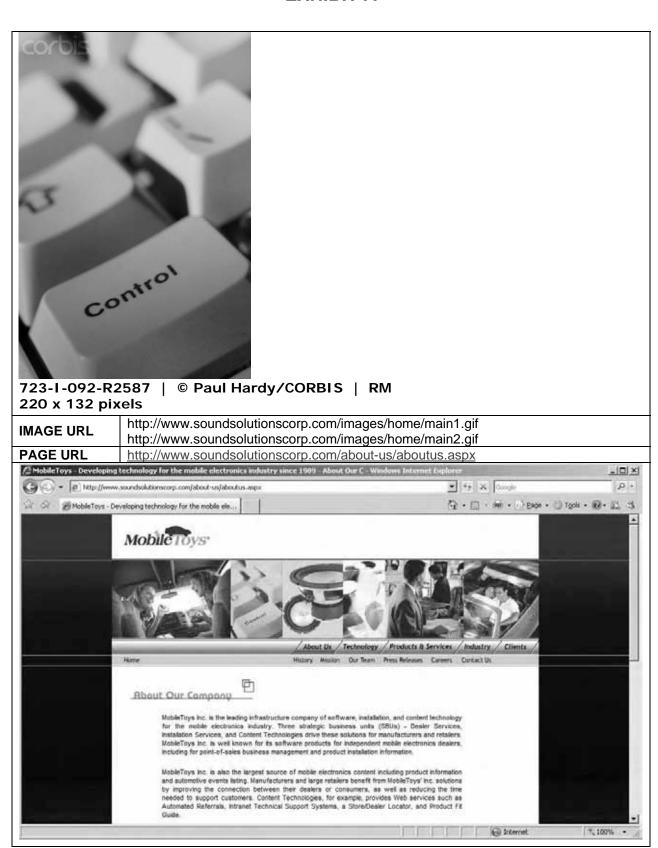


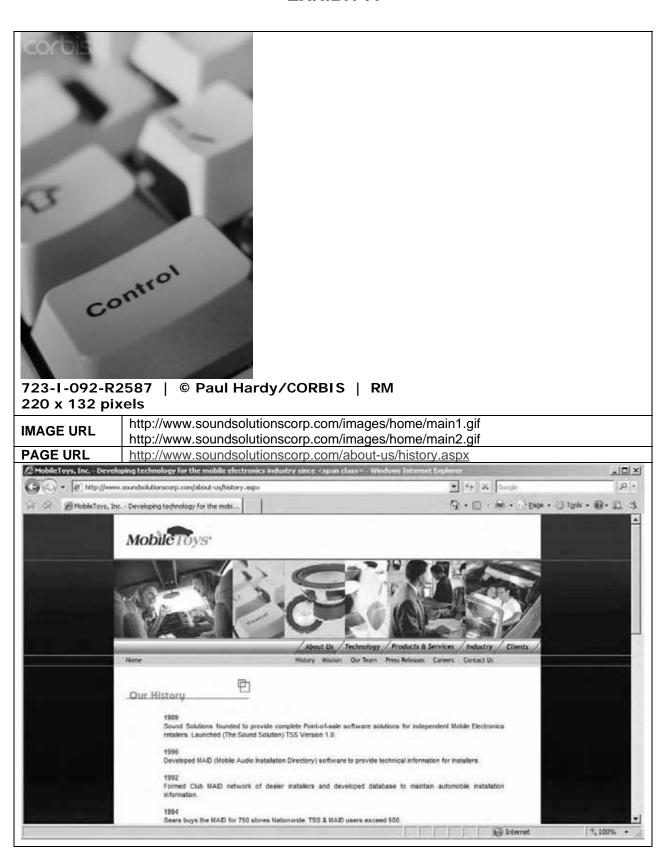


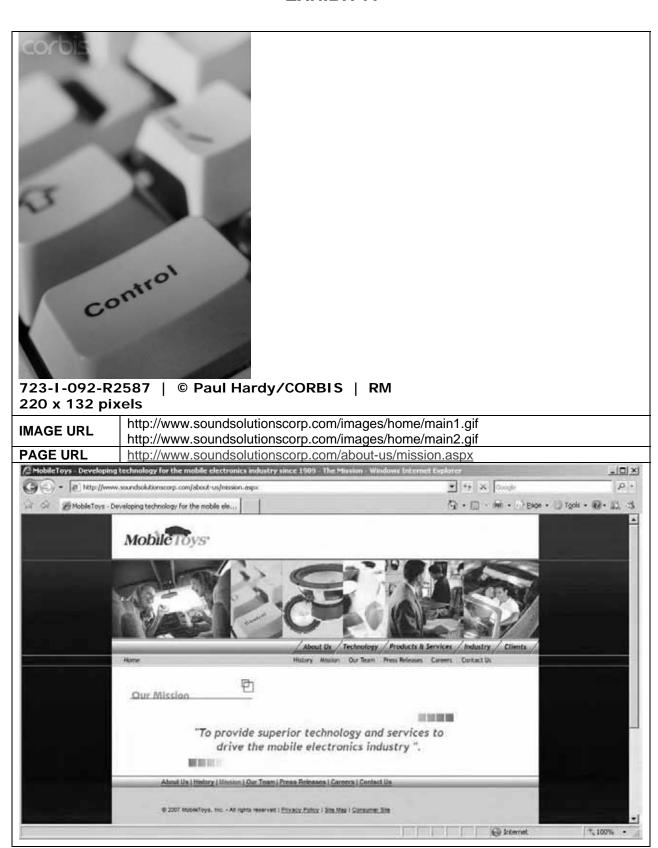


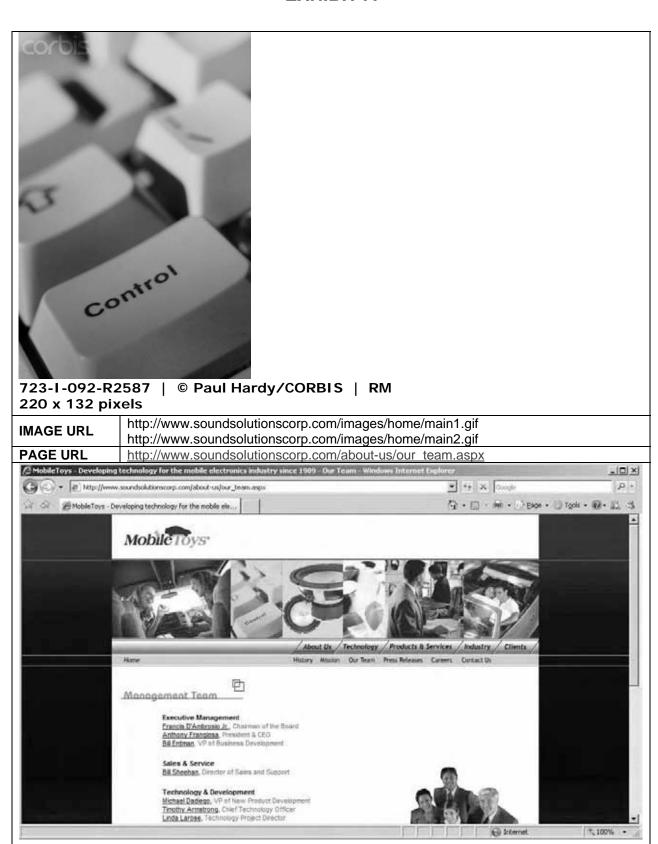


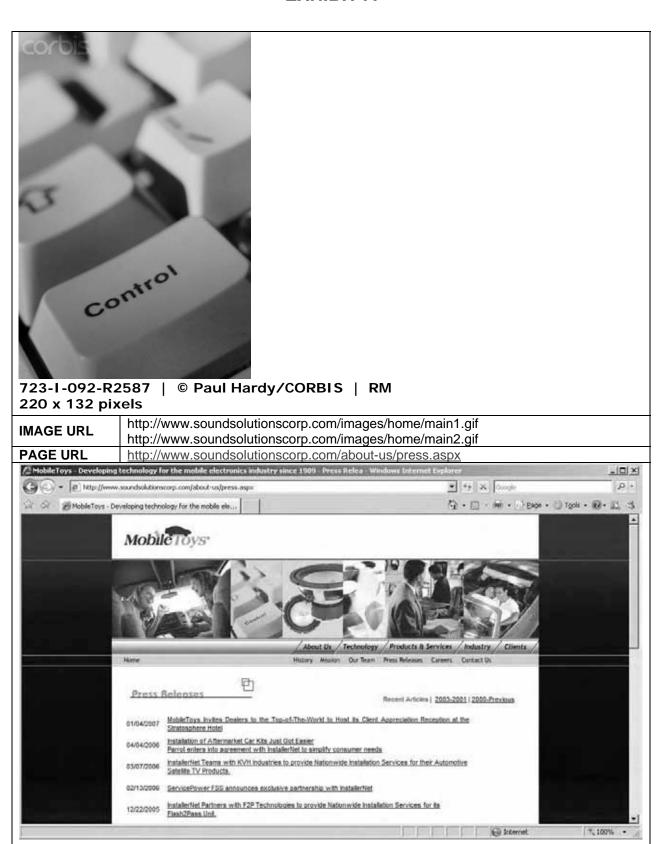


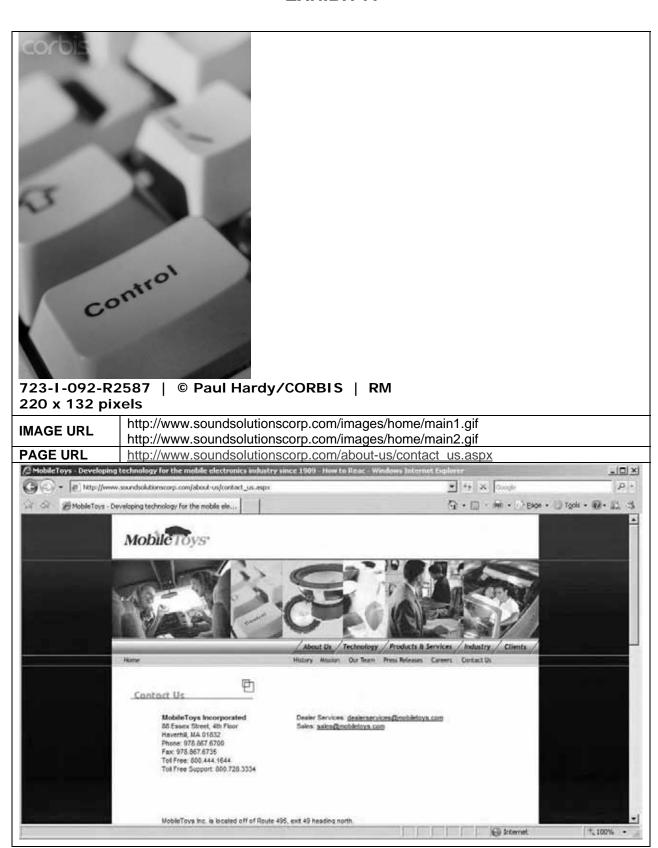


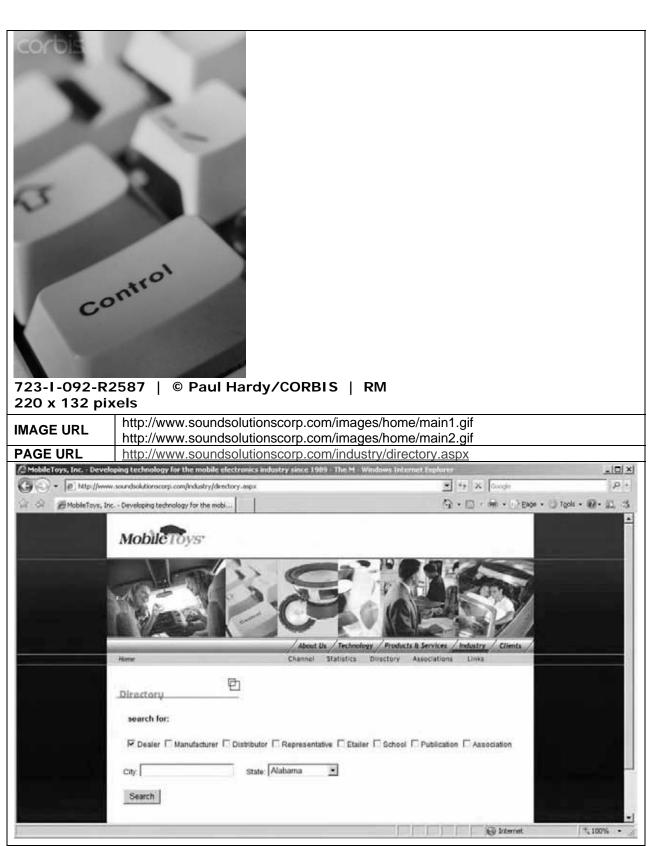


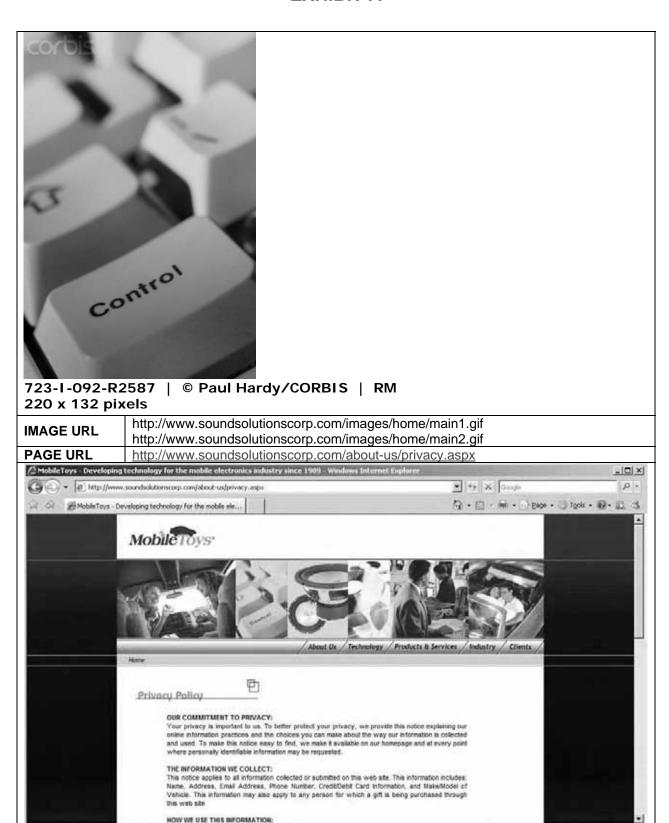






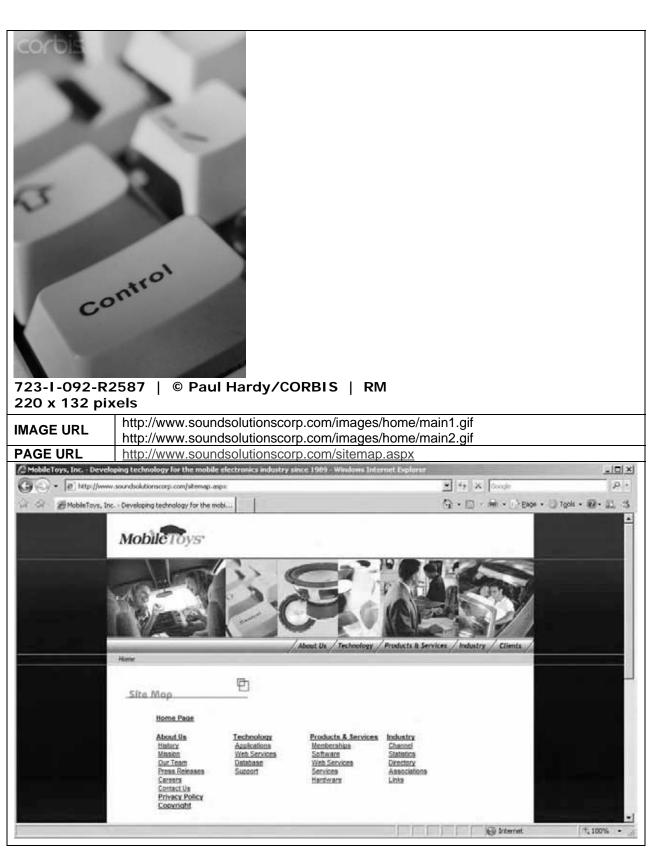




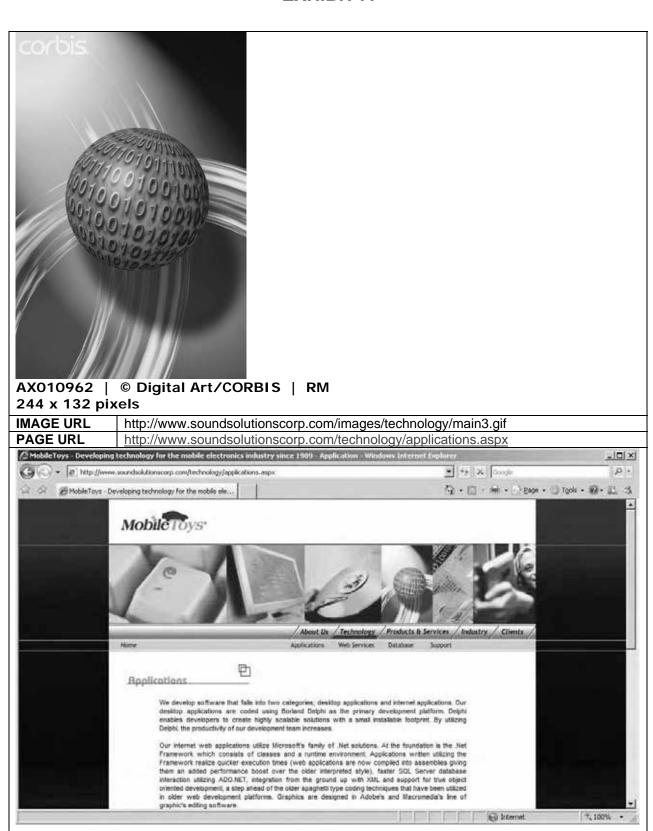


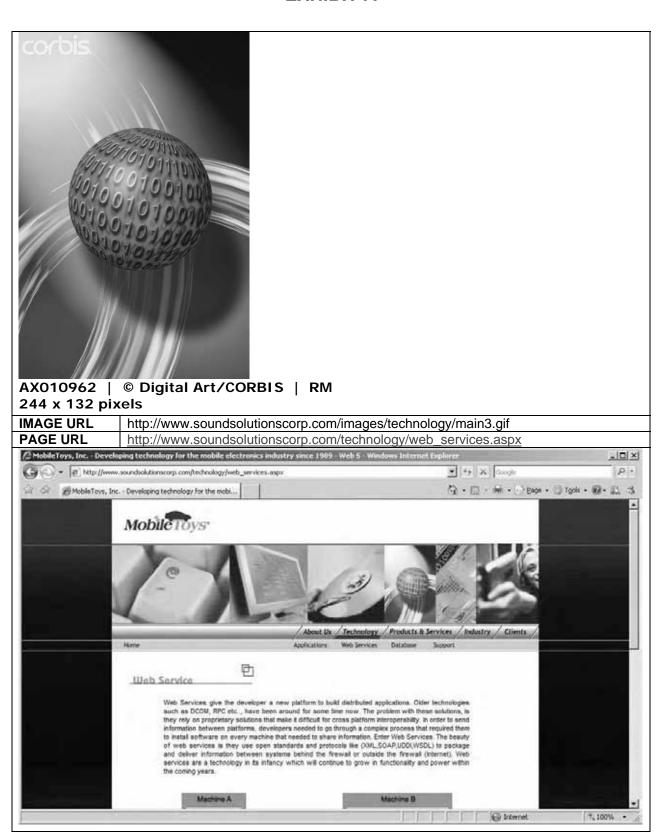
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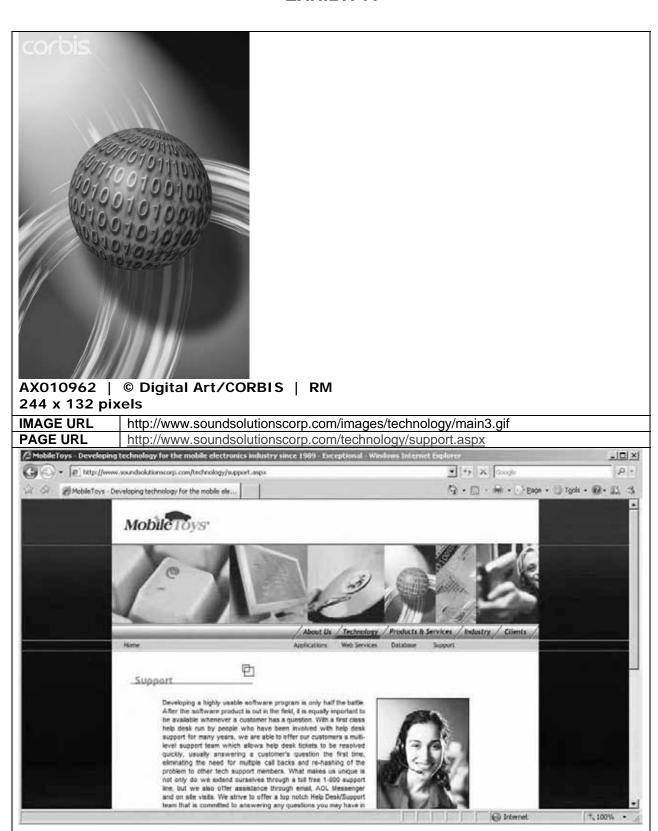




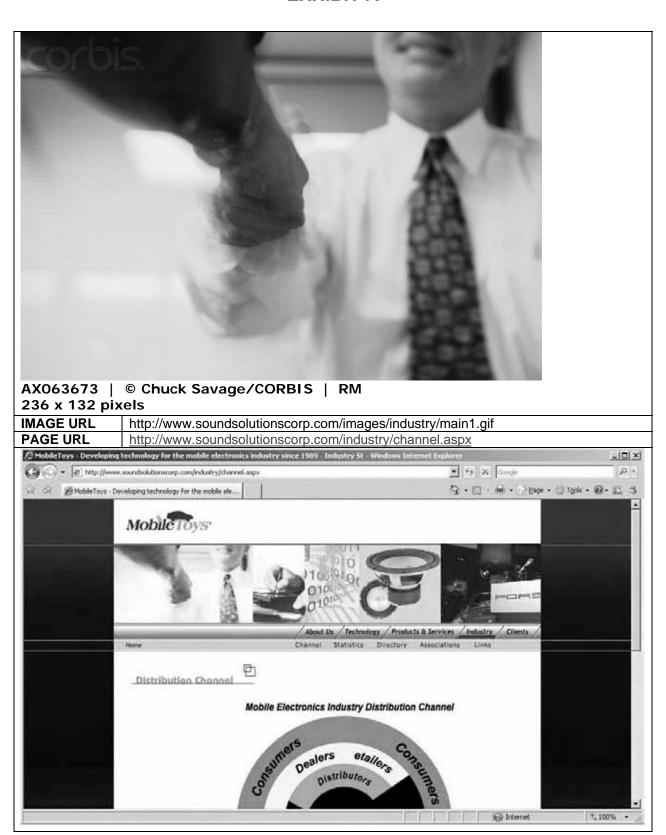
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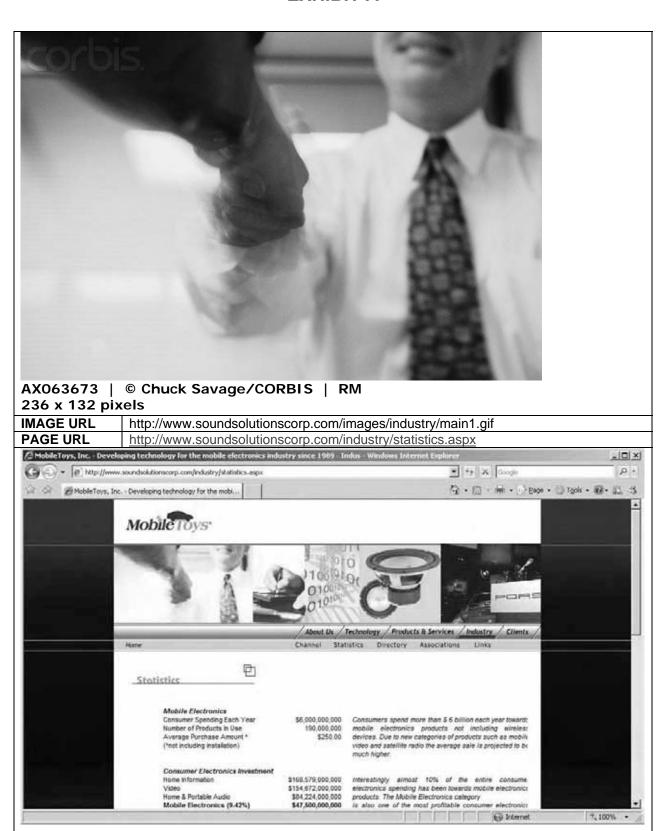
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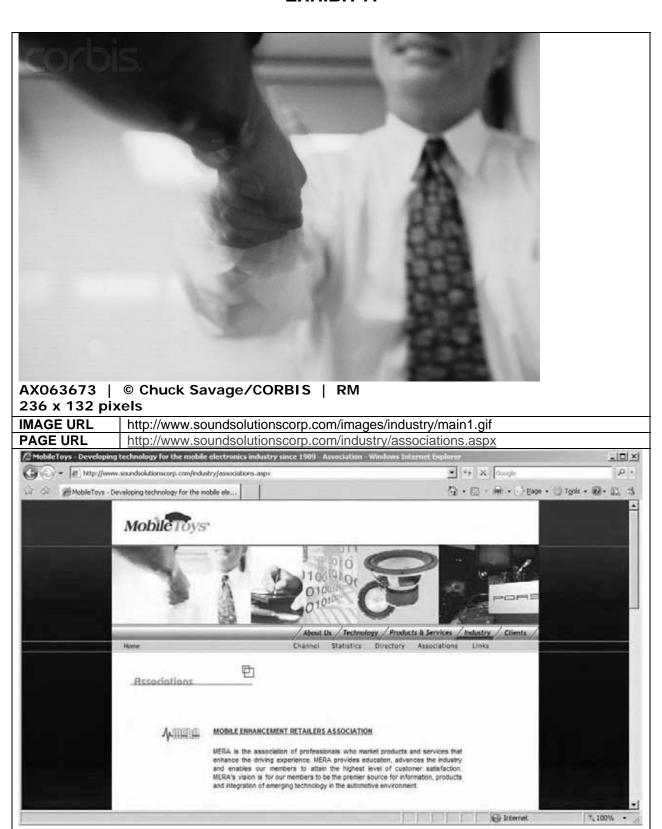
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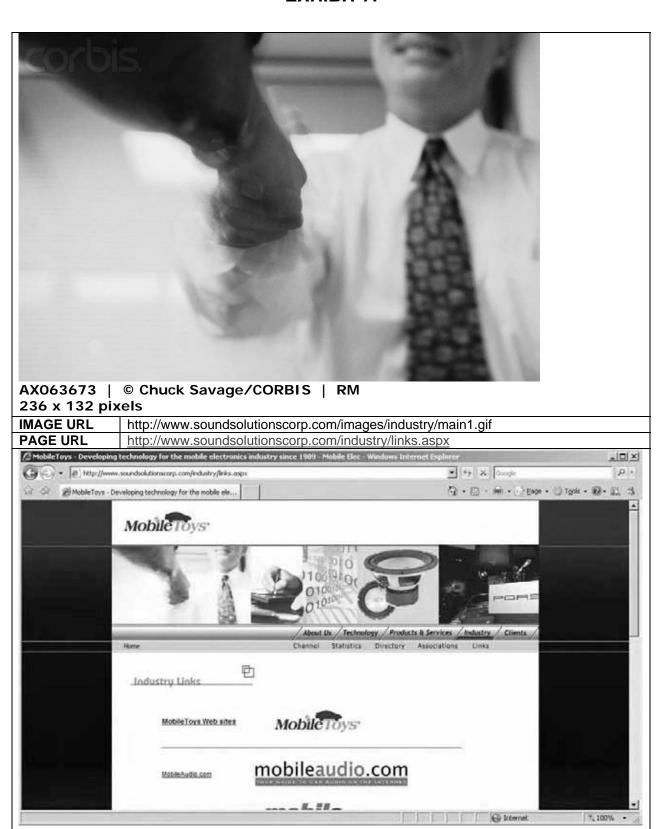
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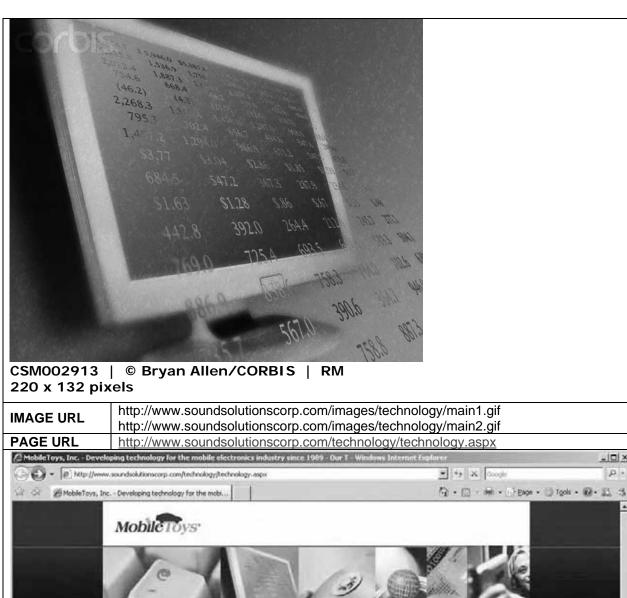




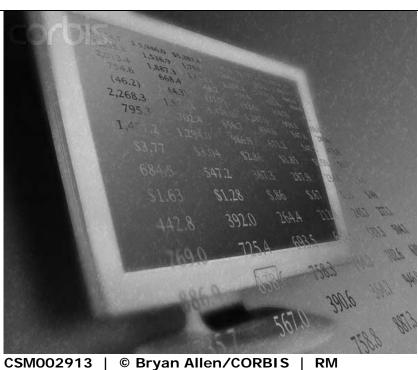




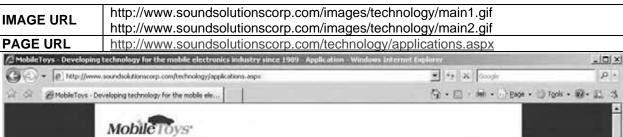




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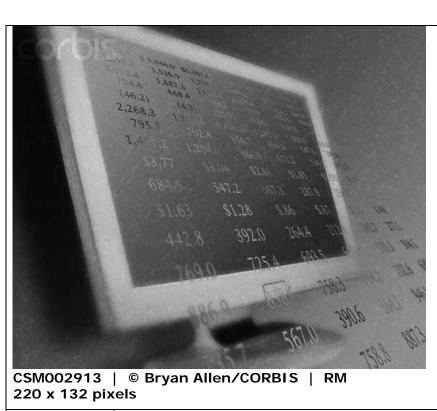
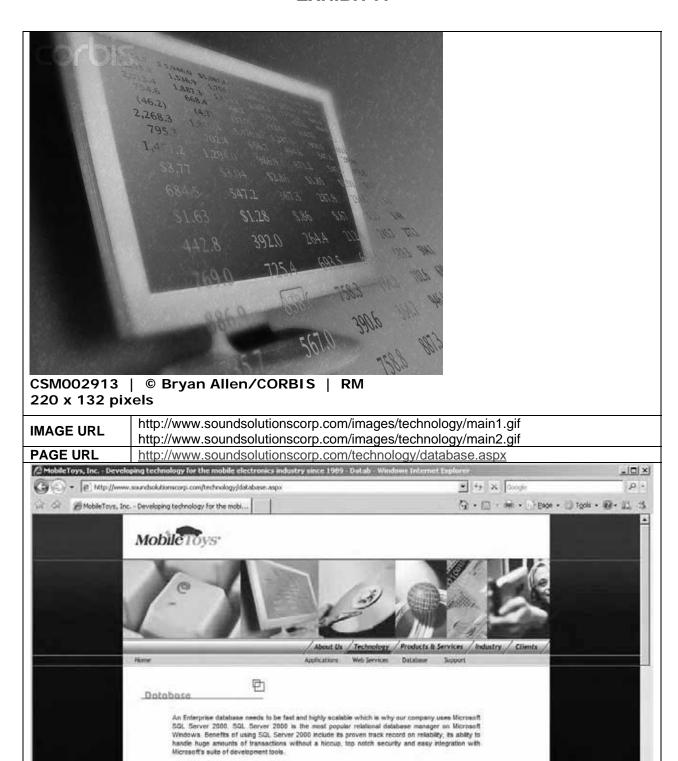


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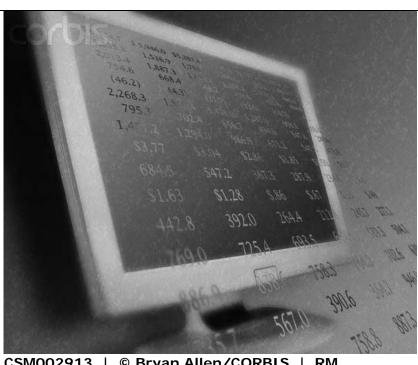




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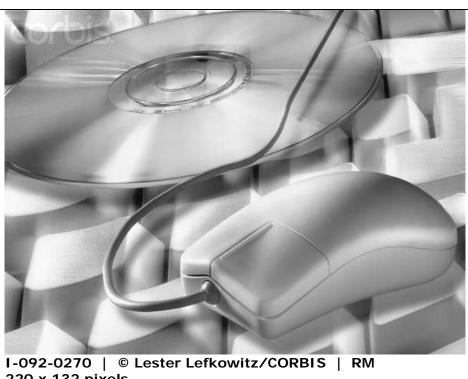




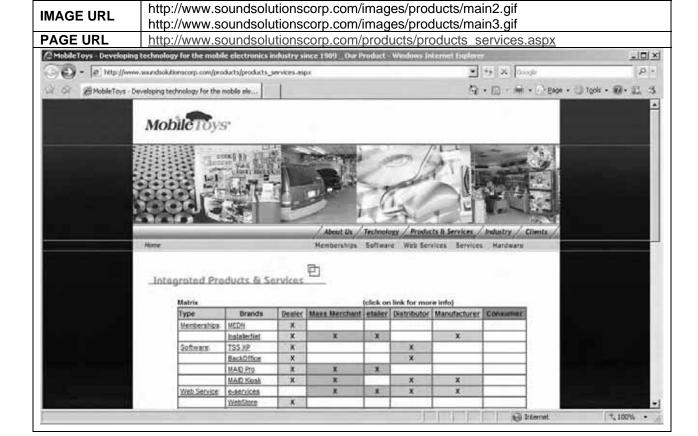


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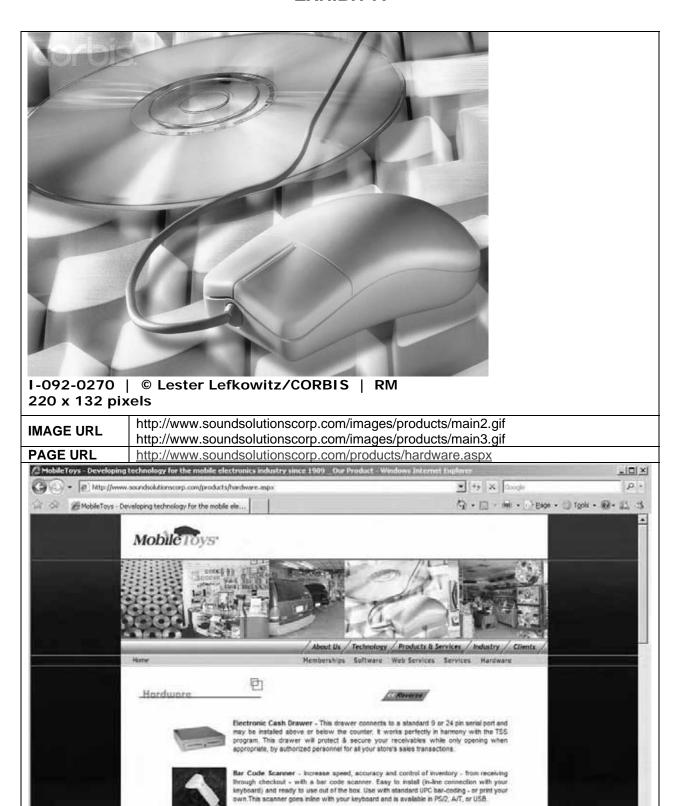












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The Mobile Electronics Industry consists of manufacturers, dealers, and installers of aftermarket automotive electronics including car stereos, CDOVD players, amplifiers, speakers, security and vehicle theft recovery systems, mobile video, radar detectors, and various types of accessories. Mobile electronics retailers also other carry wireless products such as pagers, cellular phones and accessories.

Emerging industry technology has spawned new product categories such as automotive GPS desirate in the committee (ALTO SIT) and establish

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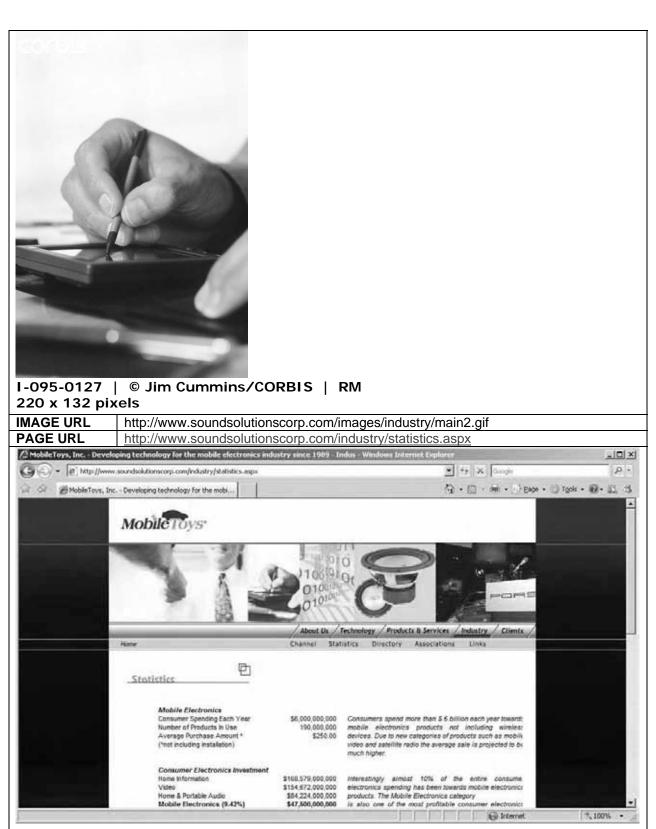
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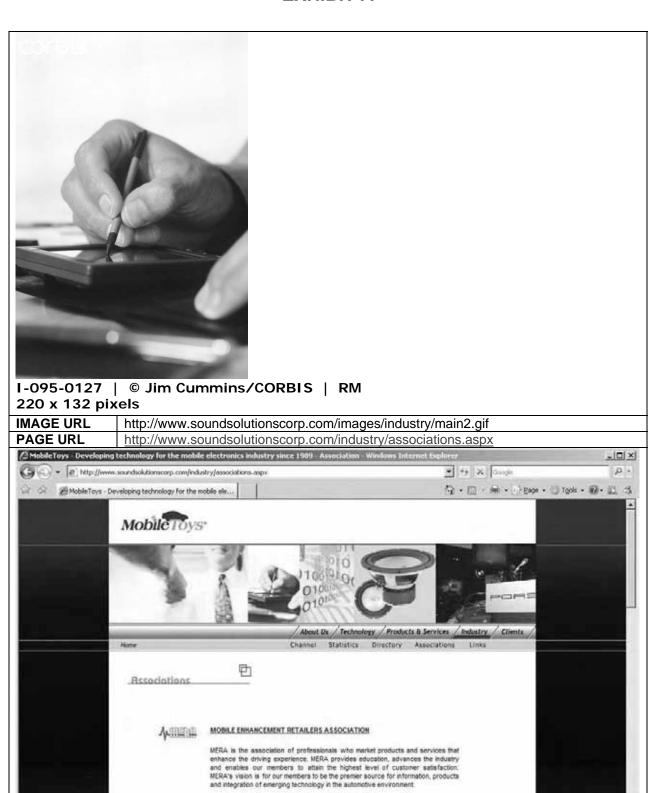
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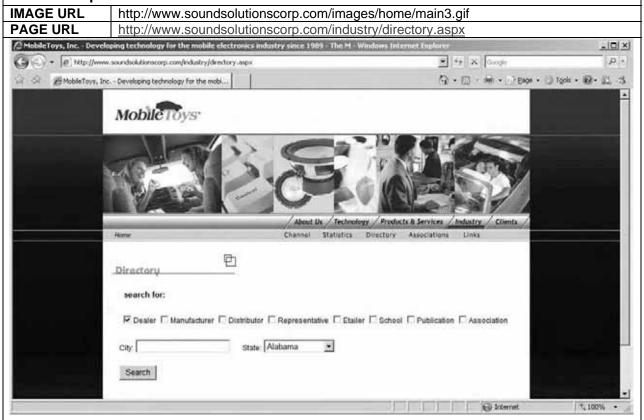


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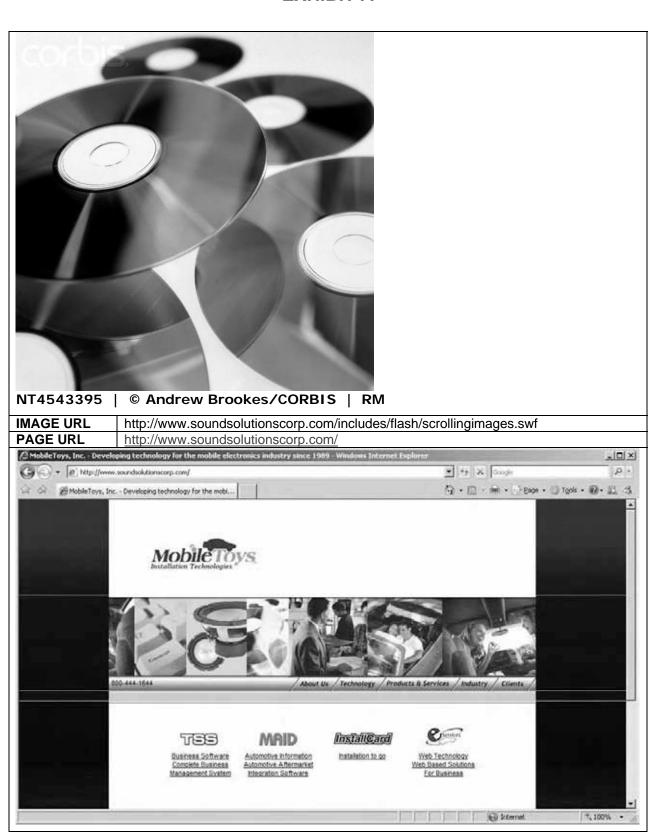
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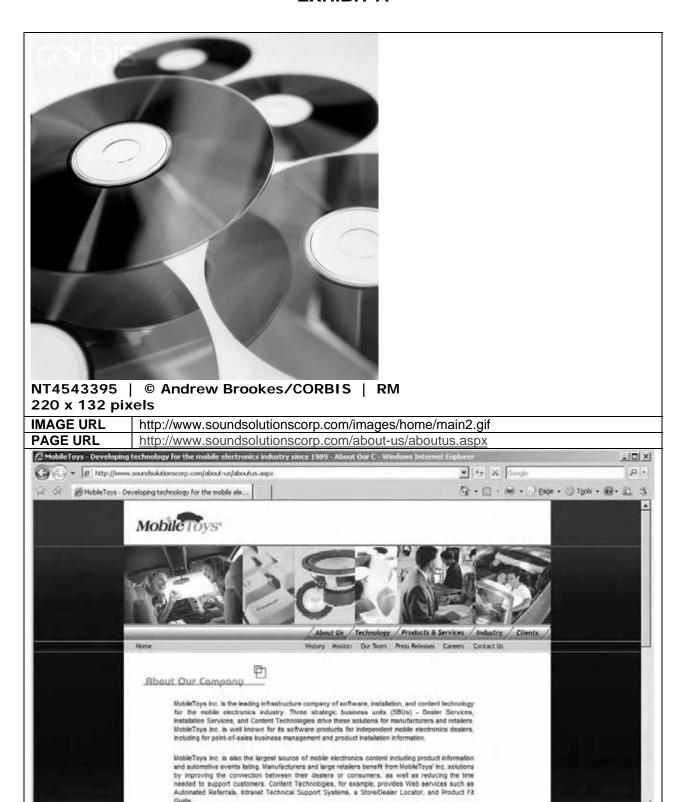




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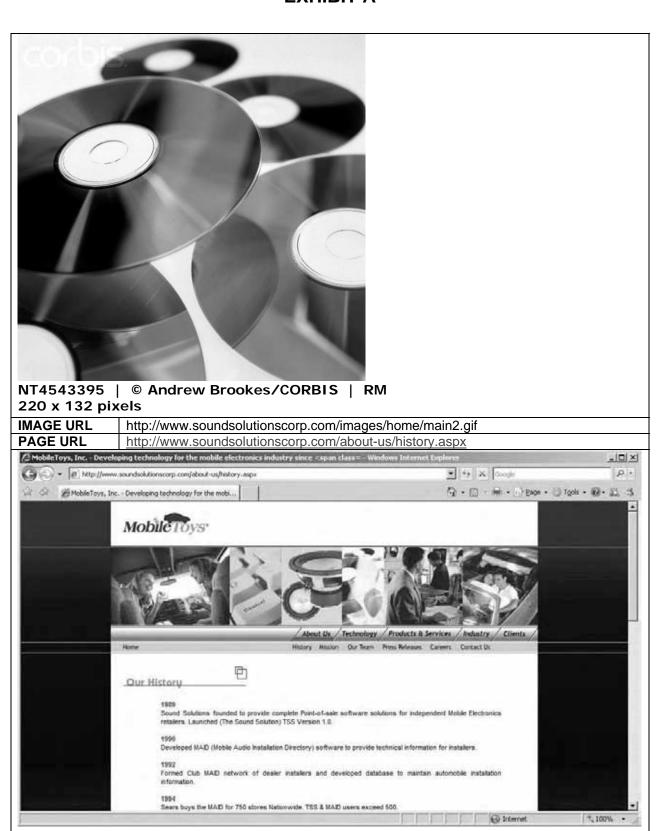


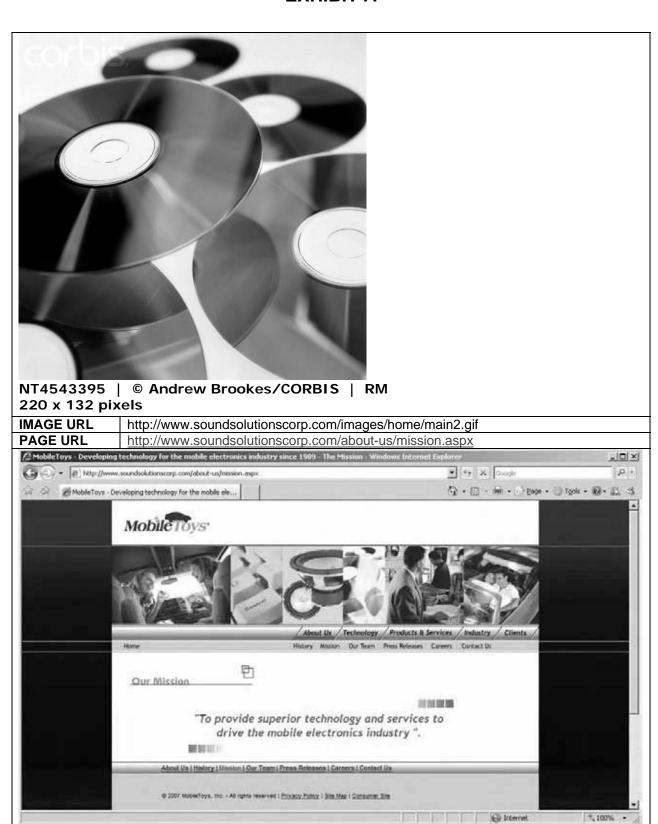


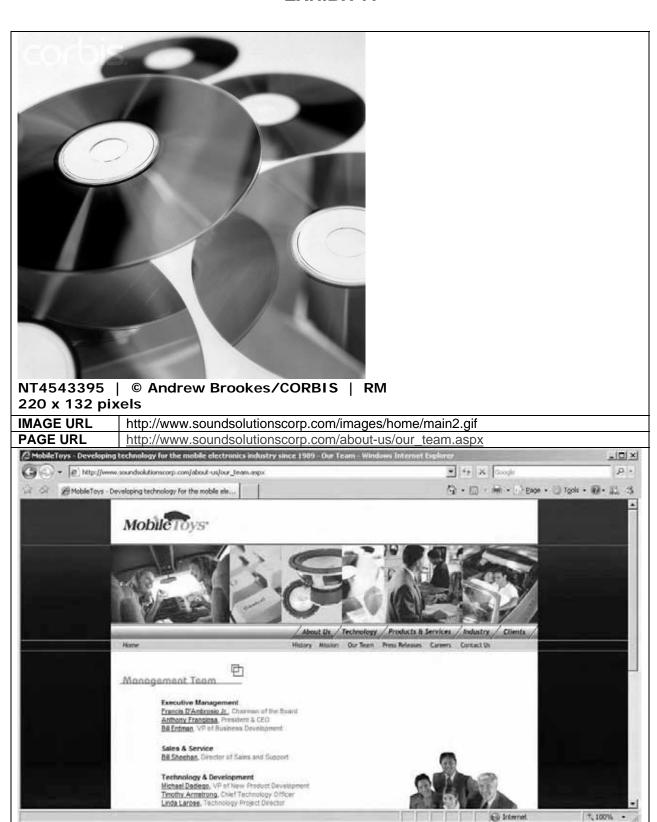


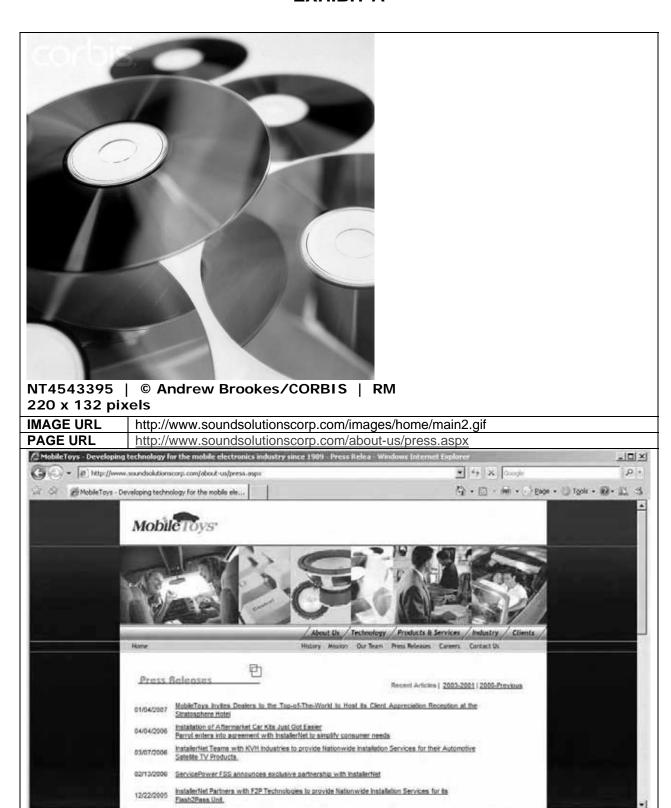
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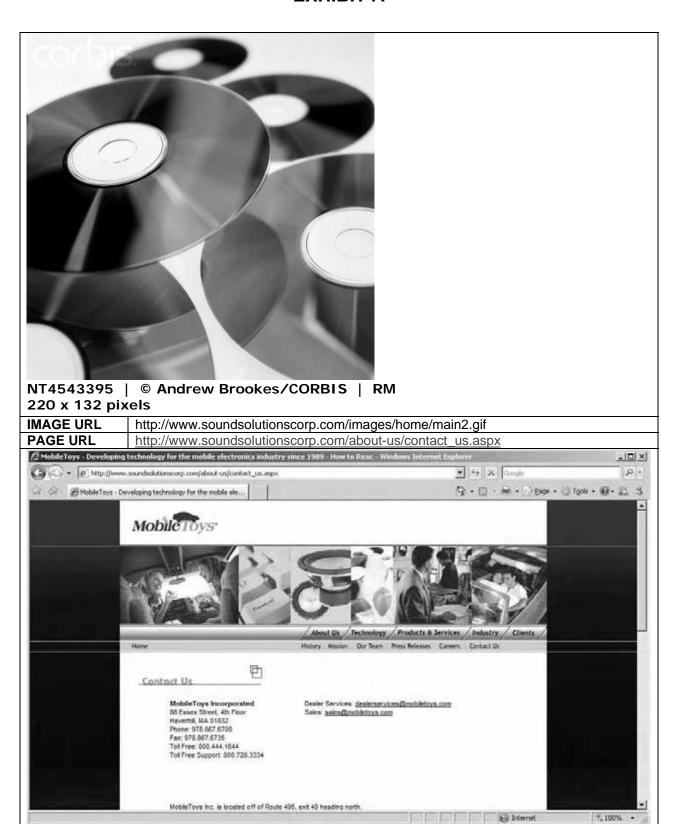


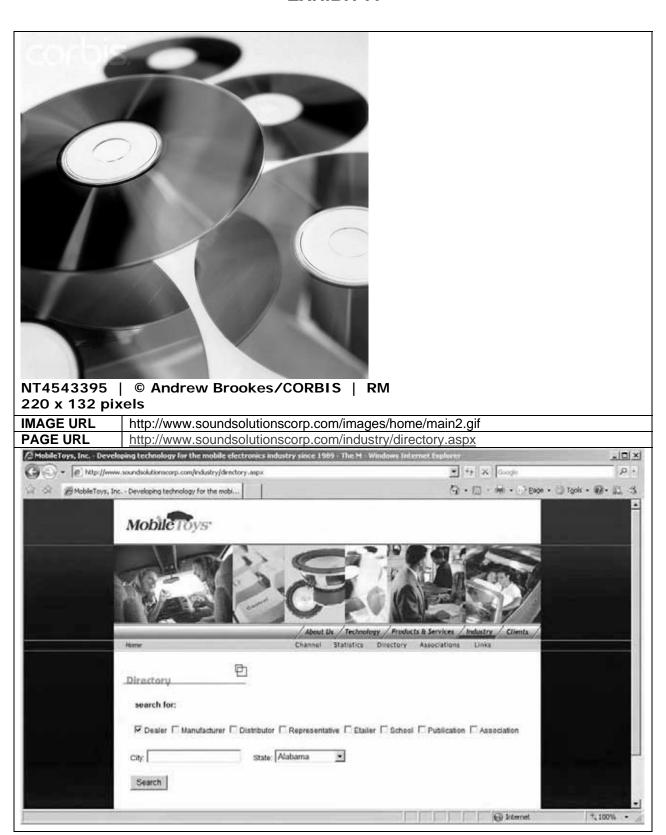




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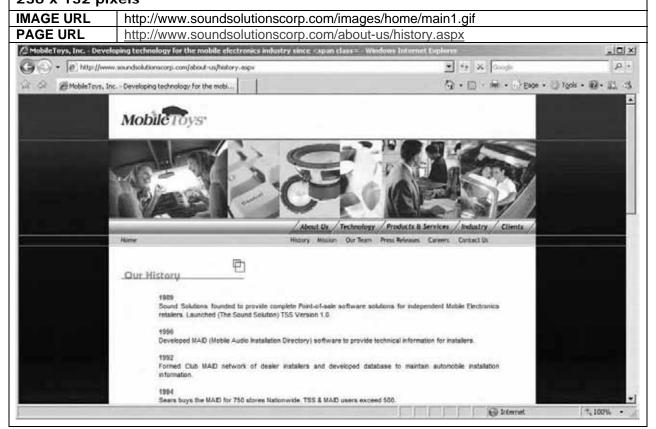


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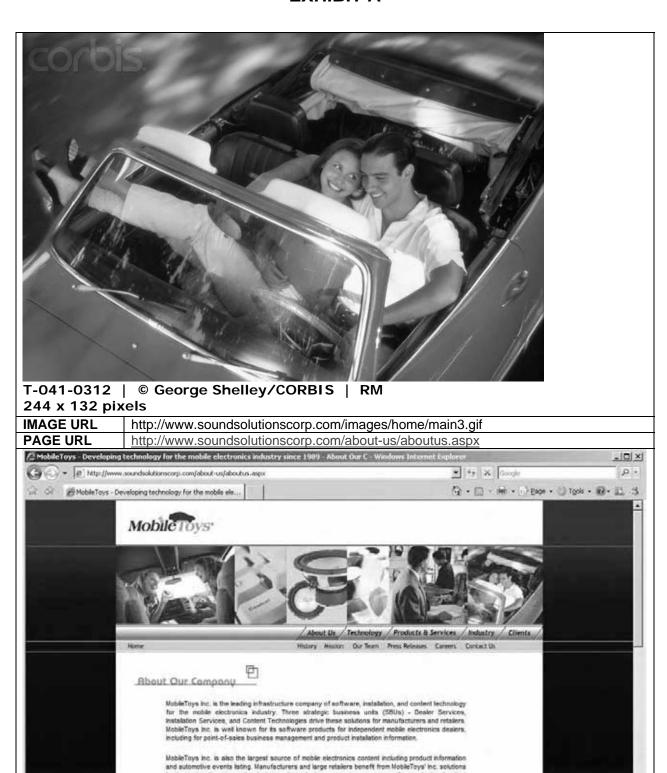
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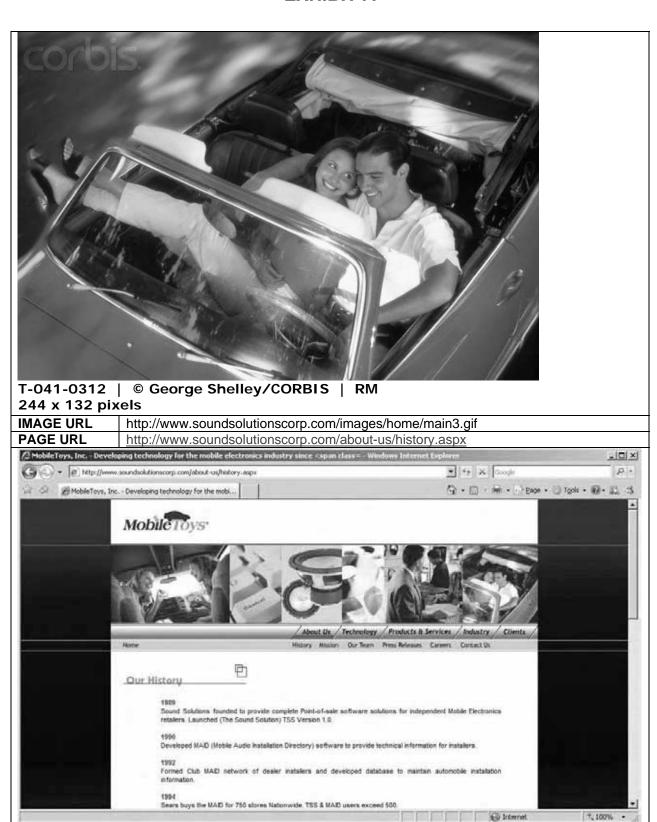


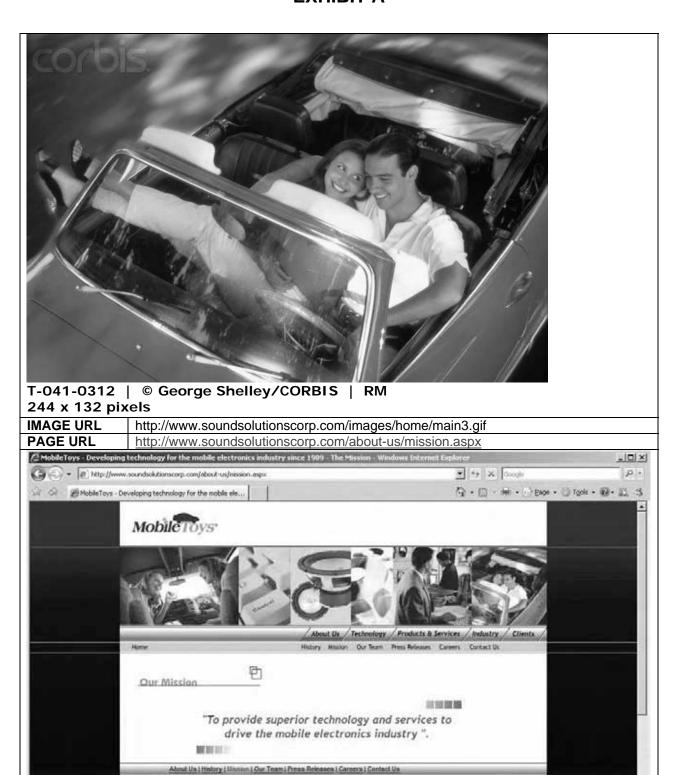


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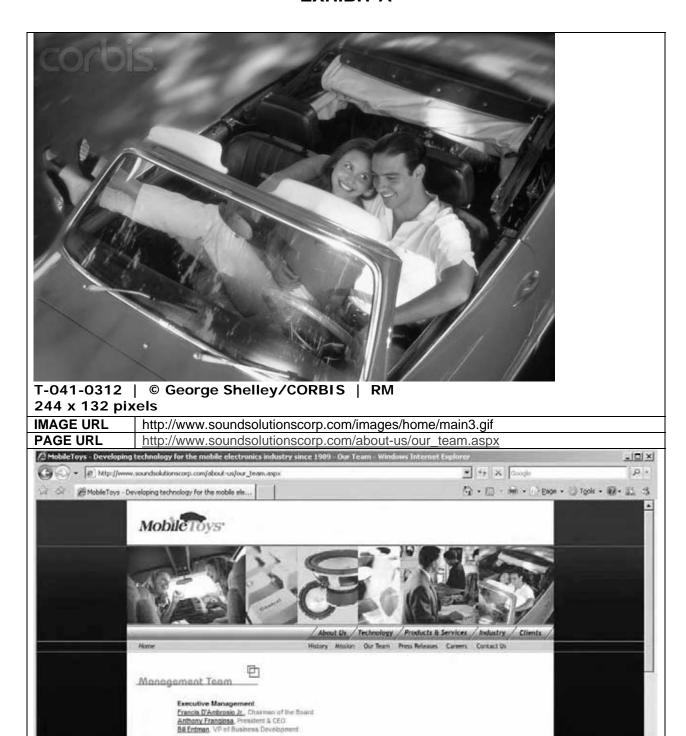




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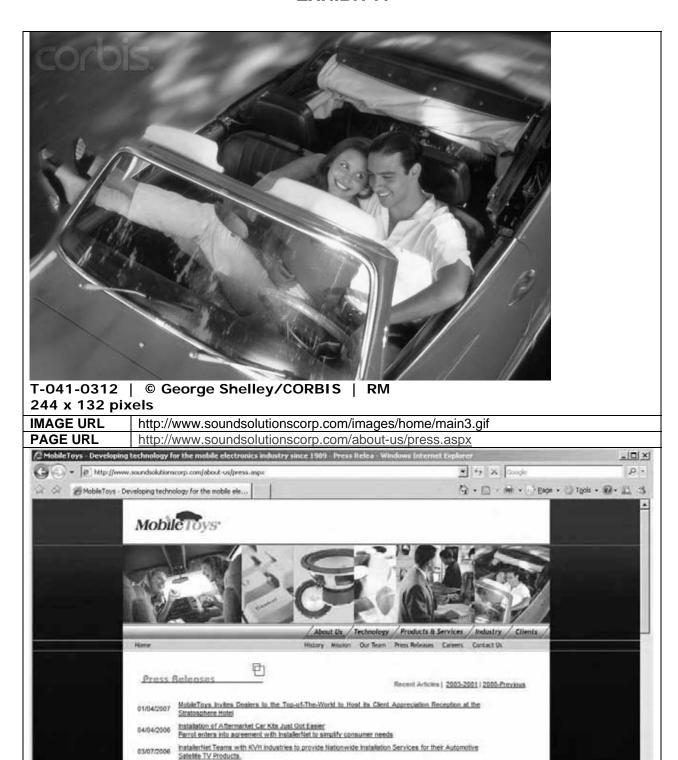
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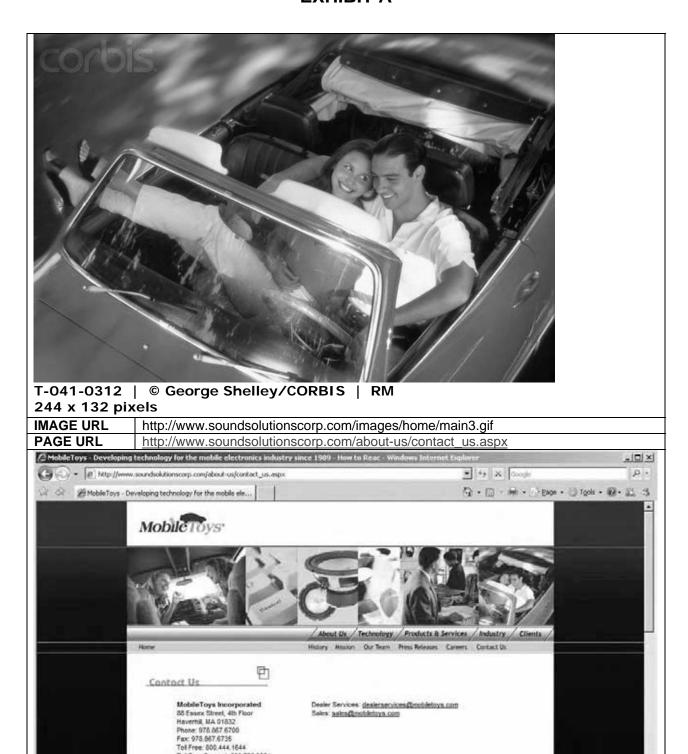


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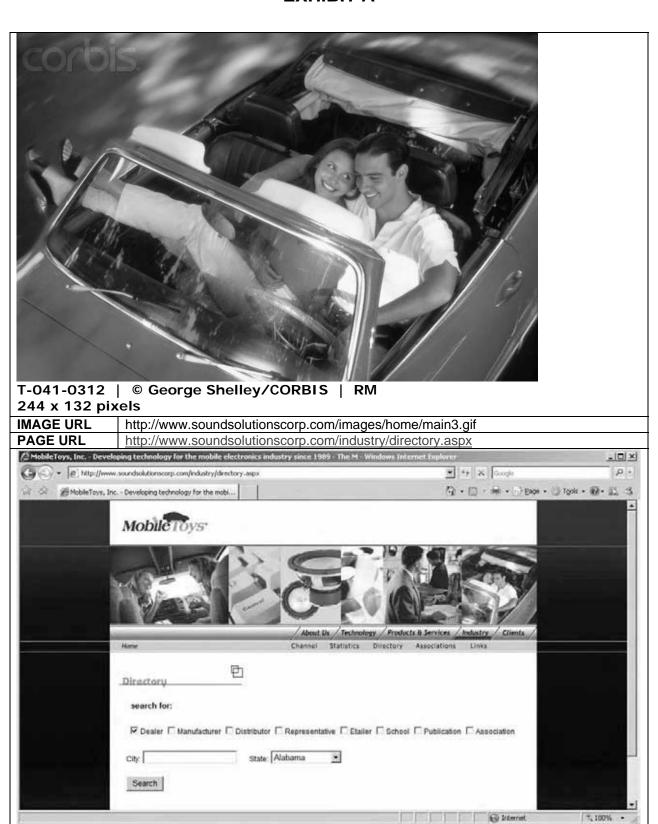


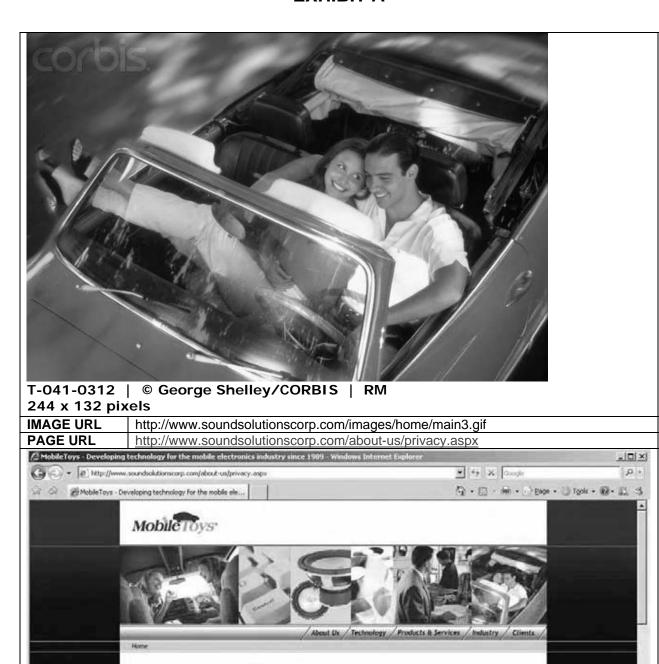
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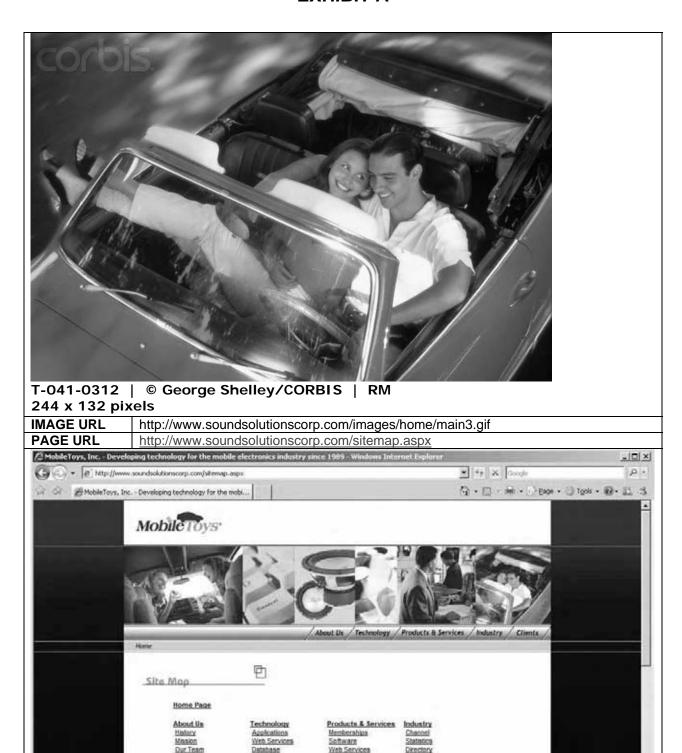
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